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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

IN RE: CASE NO. 18-19441-EPK
Chapter 11
160 ROYAL PALM, LLC,
Debtor.

Shraiberg Landau & Page
2385 NW Executive Center Drive
Suite 300
Boca Raton, FL 33431
November 26, 2018
9:15 a.m. to 4:45 p.m.

DEPOSITION

OF

MARIA MATTHEWS

Taken pursuant to Notice,
On behalf of the Debtor.

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APPEARANCES:

SHRAIBERG LANDAU & PAGE, by
PHILIP J. LANDAU, ESQUIRE
On behalf of the Debtor

SALAZAR LAW, by
LUIS SALAZAR, ESQUIRE
On behalf of KK-PB Financial, LLC

GEORGE GESTEN McDONALD, by
DAVID J. GEORGE, ESQUIRE
On behalf of the EB-5 Investors

KAMMERER MARIANI, by
JOHN F. MARIANI, ESQUIRE
On behalf of Maria Matthews

ALSO PRESENT:

GLENN STRAUB

I-N-D-E-X

WITNESS DIRECT CROSS REDIRECT RE-CROSS

MARIA MATTHEWS

By Mr. Landau	4	258	
By Mr. George	120		--
By Mr. Salazar	260		--

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EXHIBITS MARKED FOR IDENTIFICATION

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*** All Exhibits were retained by Mr. Landau.

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Thereupon,
MARIA MATTHEWS,
having been first duly sworn, was examined and testified
as follows:

DIRECT EXAMINATION

BY MR. LANDAU:

Q. Ma'am, can you please state your name, for
the record?
A. Maria Matthews.
Q. And do you go by any nicknames?
A. Mia Matthews.
Q. Okay, and what is your address?
A. 101 Casa Bendita, Palm Beach, Florida 33480.
Q. And how long have you been residing there?
A. Over ten years. I'm not sure of the exact
number of years.
Q. And who resides at that home with you?
A. Robert Matthews.
Q. And do you have any children?
A. Yes.
Q. What are their names?
A. Miranda and Bianca.
Q. And how old are they?
A. Bianca is 18, Miranda is 19.
Q. Okay, and do they both reside at that home

1 (Pages 1 to 4)

<p style="text-align: right;">Page 5</p> <p>1 with you?</p> <p>2 A. No.</p> <p>3 Q. Where do they live?</p> <p>4 A. Miranda is at college and working in</p> <p>5 Connecticut currently. Bianca is living in Albany,</p> <p>6 California.</p> <p>7 Q. And where is Miranda in school in</p> <p>8 Connecticut?</p> <p>9 A. She's in school at Dartmouth College in</p> <p>10 New Hampshire.</p> <p>11 Q. Okay.</p> <p>12 A. She is currently on leave as a preschool</p> <p>13 teacher in Connecticut.</p> <p>14 Q. Okay, and what year did she get through at</p> <p>15 Dartmouth?</p> <p>16 A. She's a sophomore.</p> <p>17 Q. Okay. So she attended there last year?</p> <p>18 A. Yes.</p> <p>19 Q. Okay, and who paid for her to attend there?</p> <p>20 A. On advice of counsel, I'm exercising my</p> <p>21 rights under the Fifth Amendment and decline to answer the</p> <p>22 question.</p> <p>23 Q. Okay. Isn't it true that Glenn Straub</p> <p>24 helped pay for her to attend college in Dartmouth?</p> <p>25 MR. SALAZAR: Object to the form of the</p>	<p style="text-align: right;">Page 7</p> <p>1 A. Yes.</p> <p>2 Q. How do you know Mr. Straub?</p> <p>3 A. On advice of counsel, I'm exercising my</p> <p>4 rights under the Fifth Amendment and decline to answer the</p> <p>5 question.</p> <p>6 Q. When was the first time that you met</p> <p>7 Mr. Straub?</p> <p>8 A. On advice of counsel, I'm exercising my</p> <p>9 rights under the Fifth Amendment and decline to answer the</p> <p>10 question.</p> <p>11 MR. LANDAU: Let's go ahead and mark that as</p> <p>12 Exhibit 1.</p> <p>13 (Thereupon, Exhibit Number 1 was marked for</p> <p>14 Identification.)</p> <p>15 MR. SALAZAR: Pass it down?</p> <p>16 MR. LANDAU: Sure.</p> <p>17 MR. STRAUB: If my attorney is dressed</p> <p>18 better than I do, I get mad.</p> <p>19 BY MR. LANDAU:</p> <p>20 Q. Ms. Matthews, Exhibit 1 is an e-mail from</p> <p>21 yourself to Mr. Straub and Craig Galle dated June 27,</p> <p>22 2002. Do you see that?</p> <p>23 MR. SALAZAR: Object to form.</p> <p>24 THE WITNESS: On advice of counsel, I'm</p> <p>25 exercising my rights under the Fifth Amendment and decline</p>
<p style="text-align: right;">Page 6</p> <p>1 question, object to relevancy.</p> <p>2 THE WITNESS: On advice of counsel, I'm</p> <p>3 exercising my rights under the Fifth Amendment and decline</p> <p>4 to answer the question.</p> <p>5 BY MR. LANDAU:</p> <p>6 Q. Bianca, what is she doing in Albany,</p> <p>7 California?</p> <p>8 A. She's a senior in high school.</p> <p>9 Q. And where -- what's the name of the high</p> <p>10 school?</p> <p>11 A. Albany High School.</p> <p>12 Q. Is that a private school?</p> <p>13 A. No.</p> <p>14 Q. And why is she there versus being in</p> <p>15 Florida?</p> <p>16 A. Because she wanted to be there and it was a</p> <p>17 good academic fit for her.</p> <p>18 Q. So who is she living with in California?</p> <p>19 A. She's living with her aunt.</p> <p>20 Q. Okay.</p> <p>21 (Thereupon, Mr. Straub enters the room.)</p> <p>22 MR. LANDAU: For the record,</p> <p>23 Mr. Glenn Straub just entered the room.</p> <p>24 BY MR. LANDAU:</p> <p>25 Q. Ms. Matthews, I assume you know Mr. Straub?</p>	<p style="text-align: right;">Page 8</p> <p>1 to answer the question.</p> <p>2 BY MR. LANDAU:</p> <p>3 Q. Okay. Have you ever seen this document</p> <p>4 before?</p> <p>5 A. On advice of counsel, I'm exercising my</p> <p>6 rights under the Fifth Amendment and decline to answer the</p> <p>7 question.</p> <p>8 Q. You have known Mr. Straub at least as early</p> <p>9 as June 27, 2010; correct?</p> <p>10 A. On advice of counsel, I'm exercising my</p> <p>11 rights under the Fifth Amendment and decline to answer the</p> <p>12 question.</p> <p>13 Q. Why did you send this letter to Mr. Straub?</p> <p>14 MR. SALAZAR: Objection to form.</p> <p>15 MR. LANDAU: What's wrong with the form?</p> <p>16 MR. SALAZAR: Lack of foundation.</p> <p>17 BY MR. LANDAU:</p> <p>18 Q. You can answer.</p> <p>19 A. On advice of counsel, I'm exercising my</p> <p>20 rights under the Fifth Amendment and decline to answer the</p> <p>21 question.</p> <p>22 Q. In this letter, you're asking him for a</p> <p>23 loan. What, if anything, was expected as consideration in</p> <p>24 exchange for the loan you were asking for here?</p> <p>25 MR. SALAZAR: Objection to form.</p>

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. Ms. Matthews, isn't it true that you were
 6 having a romantic relationship with Mr. Straub?
 7 MR. SALAZAR: Object to form, object to
 8 relevancy, and object to this profound lack of any kind of
 9 professionalism in going into these questions.
 10 BY MR. LANDAU:
 11 Q. You can answer.
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 Q. In fact, isn't it true that you were having
 16 a romantic relationship with Mr. Straub at the time this
 17 e-mail was sent?
 18 MR. SALAZAR: Same objection.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 MR. MARIANI: Excuse me, is this my copy?
 23 MR. LANDAU: Yeah,
 24 MR. MARIANI: Okay.
 25 MR. LANDAU: Oh, no, no, no. That's the

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1 original. Did I not give you one?
 2 MR. MARIANI: No.
 3 MR. LANDAU: I apologize.
 4 MR. MARIANI: Thank you. Okay. Where do
 5 you want to keep the originals?
 6 MR. LANDAU: Just in front of her.
 7 MR. MARIANI: I'll put them right here.
 8 MR. LANDAU: Yeah, that's perfect.
 9 MR. SALAZAR: That was 1?
 10 MR. LANDAU: Yes. Let's go ahead and mark
 11 this as Composite 2.
 12 (Thereupon, Composite Exhibit Number 2 was
 13 marked for Identification.)
 14 MR. MARIANI: Thank you. Let me take a look
 15 at it, please.
 16 THE WITNESS: It's the same as yours?
 17 MR. MARIANI: Can I ask about the Bates
 18 numbers? What Bates numbers are those?
 19 MR. LANDAU: I believe these were produced
 20 in documents that we requested from -- that were produced
 21 to us from Craig Galle.
 22 MR. SALAZAR: I don't think that's correct.
 23 MR. LANDAU: No?
 24 MR. SALAZAR: Is there any other source,
 25 because this is not our Bates stamp.

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1 MR. LANDAU: There have been many
 2 productions, it could have been from the Bob Matthews'
 3 production.
 4 MR. MARIANI: No, understood. Do you know
 5 who Bates stamped them, that's my question?
 6 MR. LANDAU: I do not. It was not -- it was
 7 not myself.
 8 MR. MARIANI: Okay. Fair enough, but can
 9 you put on the record the Bates stamp numbers --
 10 MR. LANDAU: Yeah, that I think will be the
 11 easiest way to go.
 12 MR. MARIANI: -- of the composite exhibit?
 13 MR. LANDAU: Right. So let me ---
 14 MR. MARIANI: Let him identify the Bates
 15 stamp numbers.
 16 MR. LANDAU: Yeah, let me just see if
 17 they're consecutive.
 18 So, for the record, the documents that we
 19 are going through, Composite 2, are Bates numbered 195
 20 through 224.
 21 MR. MARIANI: I would ask you to indicate
 22 you don't know the source of the Bates numbering.
 23 MR. LANDAU: Yeah, at this time I can't --
 24 I'm not sure which production this arises from.
 25 MR. MARIANI: Thank you.

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1 MR. SALAZAR: For the record, whatever the
 2 production is, we'd like a full copy, please.
 3 MR. LANDAU: You have a full copy.
 4 MR. SALAZAR: Are you sure?
 5 MR. LANDAU: Absolutely.
 6 MR. SALAZAR: How do you know that if you
 7 don't know which production ---
 8 MR. LANDAU: Well, I know I've given you
 9 everything that I have.
 10 MR. SALAZAR: We should check, I am not sure
 11 that's the case.
 12 MR. LANDAU: Yeah, positive.
 13 BY MR. LANDAU:
 14 Q. Okay. So we'll start with the e-mail that's
 15 at Bates Number 195. Do you see that?
 16 A. Yes.
 17 Q. Okay.
 18 A. Oh, I mean -- oh, okay, whatever.
 19 Q. And the docket that's at Bates 195 -- well,
 20 have you seen this e-mail before?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 Q. Okay. Isn't it true that this e-mail
 25 represents the loan that you were asking Mr. Straub to

3 (Pages 9 to 12)

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1 make on your behalf?
 2 MR. SALAZAR: Object to the form of the
 3 question and relevancy.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. If we flip to the next page, 196, that's the
 9 same exhibit as Exhibit 1. Do you see that?
 10 A. On advice of counsel, I'm exercising my
 11 rights under the Fifth Amendment and decline to answer the
 12 question.
 13 Q. Okay, and in that e-mail you refer to a
 14 letter from an insurance adjuster. The next few pages,
 15 190 -- Bates Number 197 and 198, are, in fact, that letter
 16 that this e-mail refers to from the insurance adjuster;
 17 correct?
 18 MR. SALAZAR: Object to form and relevancy.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer that question.
 22 BY MR. LANDAU:
 23 Q. And that letter, the letter from
 24 Giordano Associates regarding the insurance claim, that's
 25 the collateral that you're seeking to pledge to Mr. Straub

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1 as referenced in the e-mail at Bates Number 196; correct?
 2 MR. SALAZAR: Object to form and relevancy.
 3 THE WITNESS: On advice of counsel, I'm
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. LANDAU:
 7 Q. I'd ask you to flip to the next page, Bates
 8 Number 199 and 200, is a letter from the law firm of
 9 Stanton & Davis to your husband.
 10 Have you seen this letter before?
 11 MR. SALAZAR: Same objection, lack of
 12 foundation.
 13 THE WITNESS: On advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 MR. LANDAU: I apologize, go off the record
 17 one second.
 18 (Discussion off the record.)
 19 MR. LANDAU: Sorry about that, back on the
 20 record.
 21 BY MR. LANDAU:
 22 Q. Ms. Matthews, we were discussing this letter
 23 from Stanton & Davis to your husband. In this letter --
 24 through this letter, this law firm for the bank that holds
 25 the mortgage on your Nantucket home was saying you were

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1 delinquent. Do you see that?
 2 MR. SALAZAR: Object to the form of the
 3 question and relevancy.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. And, in fact, going back to Bates Number
 9 196, this is the reason you are seeking a loan from
 10 Mr. Straub; correct?
 11 MR. SALAZAR: Same objection.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. And if you'd flip to Bates Number 202, this
 17 is an e-mail to Craig Galle -- from Craig Galle to
 18 Keith Mahler, I don't know if I'm pronouncing that right,
 19 and you and your husband, Bob Matthews, are copied on
 20 this. Do you see that?
 21 MR. SALAZAR: Object to the form and
 22 relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. Have you seen this document before?
 3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.
 6 Q. And through this e-mail, Mr. Galle is
 7 sending Mr. Mahler an assignment of second mortgage
 8 relating to the Nantucket home; correct?
 9 MR. SALAZAR: Same objection.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. And, in fact, Mr. Straub, through one of his
 15 companies, acquired that second mortgage; correct?
 16 MR. SALAZAR: Same objection.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. If we flip to the next page, Bates Number
 22 203, can you tell me what this document is?
 23 MR. MARIANI: Which page number, Counsel?
 24 MR. LANDAU: 203, Bates Number 203.
 25 MR. MARIANI: So you're skipping 201 and

4 (Pages 13 to 16)

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1 202, is that fair?
 2 MR. SALAZAR: I'm sorry, what?
 3 MR. LANDAU: No, I thought we just discussed
 4 202.
 5 MR. GEORGE: He just asked questions about
 6 202.
 7 MR. LANDAU: Yeah.
 8 MR. MARIANI: Okay. Thank you.
 9 MR. LANDAU: I apologize. For the record,
 10 the prior questions, if I didn't state it already, were
 11 related to Bates Number 202.
 12 MR. SALAZAR: I renew the objection.
 13 BY MR. LANDAU:
 14 Q. Okay. So back to Bates Number 203, have you
 15 seen this document before?
 16 A. On advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 Q. In fact, it's an e-mail from Craig Galle to
 20 yourself and Bob Matthews; correct?
 21 MR. SALAZAR: Object to the form of the
 22 question and relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. The e-mail address that's listed here for
 3 yourself, miamatthews@mac, m-a-c, .com, is that, in fact,
 4 your e-mail address?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 Q. You can't confirm your e-mail address?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. And through this e-mail, what is it that
 13 Mr. Galle is asking you to review?
 14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 MR. SALAZAR: Pardon me, same objection to
 18 that question.
 19 MR. LANDAU: What -- what would be wrong
 20 with the form of the question?
 21 MR. SALAZAR: I think it lacks a predicate
 22 in several different ways.
 23 BY MR. LANDAU:
 24 Q. In fact, Ms. Matthews, if we read through
 25 this document, Mr. Galle is presenting to you -- let's go

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1 through them one by one, a loan agreement; yes?
 2 MR. SALAZAR: Object to the form of the
 3 question.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. Number two is a promissory note with balloon
 9 payment.
 10 MR. SALAZAR: Objection to form and
 11 relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. Number three is an assignment of insurance
 17 proceeds.
 18 MR. SALAZAR: Same objection.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. Number four is a UCC-1 financing statement.
 24 MR. SALAZAR: Same objection.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. Number five is an assignment of second
 5 mortgage.
 6 MR. SALAZAR: Same objection.
 7 BY MR. LANDAU:
 8 Q. Correct?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. And then Number 6 is an assignment of loan
 13 documents and transfer of debt and liens; correct?
 14 MR. SALAZAR: Same objection.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. Bates Number 204 and 205, have you seen this
 20 document before?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 Q. This e-mail, you are cc'd on it; correct?
 25 MR. SALAZAR: Object to the form and

5 (Pages 17 to 20)

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1 relevancy.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. Okay. The next document, let me cover this
 7 as quickly as possible. Okay. So Bates Numbers 206
 8 through 223, all relate to this e-mail at Bates Number
 9 206.
 10 Have you seen these documents before?
 11 MR. SALAZAR: Object to form and relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. In fact, the e-mail is addressed to you and
 17 Bob Matthews; correct?
 18 MR. SALAZAR: Object to form and relevancy.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. And they're asking you to execute various
 24 loan documents between Bob Matthews and Equipment Leasing
 25 International, LLC; correct?

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1 MR. SALAZAR: Object to form and relevancy.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. In fact, if you'd turn to 219, which is the
 7 assignment of insurance proceeds, that document also
 8 includes you as an assignor; correct?
 9 MR. SALAZAR: Object to the form of the
 10 question and relevancy.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Do you recall signing these documents?
 16 MR. SALAZAR: Object to form and relevancy.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. In fact, you and your husband did execute
 22 these documents; correct?
 23 MR. SALAZAR: Object to form and relevancy.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. I'd ask you to turn to Bates Number 220. At
 4 Bates Number 220 is the signature page for the assignment
 5 of insurance proceeds, which begins at Bates Number 219.
 6 Is that your signature on Bates Number 220?
 7 MR. SALAZAR: Object to the form and
 8 relevancy.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. Did you sign this document?
 14 MR. SALAZAR: Same objection.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. I ask you to flip to the next page, Bates
 20 Number 221. This is a UCC financing statement.
 21 Have you seen this document before?
 22 MR. SALAZAR: Same objection.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. Did you sign this document, Ms. Matthews?
 3 MR. SALAZAR: Same objection.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. The signature towards the bottom where it
 9 says Mia Matthews, is that your signature?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Ms. Matthews, did you sign this document at
 16 Bates Number 221?
 17 MR. SALAZAR: Same objection, and asked and
 18 answered.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. Mr. Straub would not have made this loan
 24 unless you signed these documents; correct?
 25 MR. SALAZAR: Objection to form and

6 (Pages 21 to 24)

Page 25

1 relevancy.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. Specifically, this assignment of insurance
 7 proceeds at Bates 219 to 220, Mr. Straub and Equipment
 8 Leasing International, LLC, would not have made this loan
 9 if you did not sign this document; correct?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. And similarly, the document at 221, the UCC
 16 financing statement, Mr. Straub and Equipment Leasing
 17 International, LLC, would not have provided the loan if
 18 you did not sign this document; correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment, decline to
 22 answer the question.
 23 MR. MARIANI: Here, I'll take care of these,
 24 don't worry about them.
 25 MR. SALAZAR: That was 2; right?

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1 MR. LANDAU: Yep.
 2 Go ahead and mark this as 3.
 3 MR. MARIANI: Thank you.
 4 (Thereupon, Exhibit Number 3 was marked for
 5 Identification.)
 6 MR. LANDAU: Good?
 7 MR. MARIANI: Yes, thank you.
 8 BY MR. LANDAU:
 9 Q. Okay. Ms. Matthews, the document that I
 10 have -- that we've labelled as Exhibit Number 3, have you
 11 seen this document before?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 Q. Who is this letter addressed to?
 16 A. On advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 Q. The letter is, in fact, addressed to you and
 20 your husband; correct?
 21 MR. SALAZAR: Object to relevancy.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. What is your understanding, Ms. Matthews, of
 2 the purpose of this letter?
 3 MR. SALAZAR: Object to form and relevancy.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. In this letter, Mr. Straub, through his
 9 company, Equipment Leasing International -- well, let me
 10 ask you that.
 11 To your knowledge, what is Equipment Leasing
 12 International, LLC?
 13 MR. SALAZAR: Objection to form and
 14 relevancy.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. Equipment Leasing International, LLC is a
 20 company owned by Glenn Straub; correct?
 21 MR. SALAZAR: Same objection.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. And through this letter, Mr. Straub is
 2 basically threatening to sue you and your husband; isn't
 3 that correct?
 4 MR. SALAZAR: Same objection, and asked and
 5 answered, too.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. Okay, and he talks about a draft complaint
 11 that will be filed if he doesn't hear back from you before
 12 close of business on Monday, October 11, 2010, if you do
 13 not, I'm quoting, "cooperate fully with me." Do you see
 14 that?
 15 MR. SALAZAR: Same objection.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. At the time this letter was sent, what was
 21 your relationship with Glenn Straub?
 22 MR. SALAZAR: Object to form and relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

7 (Pages 25 to 28)

Page 29

1 BY MR. LANDAU:
 2 Q. When was the last time you've spoken to
 3 Mr. Straub?
 4 A. On advice of counsel, I'm exercising my
 5 rights under the Fifth Amendment and decline to answer the
 6 question.
 7 Q. Okay. Well, you provided us with -- through
 8 discovery, copies of text messages between yourself and
 9 Mr. Straub. Do you recall that?
 10 A. On advice of counsel, I'm exercising my
 11 rights under the Fifth Amendment and decline to answer the
 12 question.
 13 Q. Okay. Well, we'll get back to those.
 14 Referring back to this letter at Bates
 15 Number 296, Equipment Leasing International, LLC
 16 subsequently sued you; correct?
 17 A. On advice of counsel, I'm exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 MR. SALAZAR: Objection as to relevancy.
 21 MR. LANDAU: What are we up to, 4?
 22 THE COURT REPORTER: 4.
 23 (Thereupon, Exhibit Number 4 was marked for
 24 Identification.)
 25 BY MR. LANDAU:

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1 Q. The document that's been marked as
 2 Exhibit 4, have you seen this document before?
 3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.
 6 Q. In fact, the document at -- that's been
 7 marked as Exhibit 4, is a complaint dated October 15,
 8 2010, and the plaintiff is Equipment Leasing
 9 International, LLC vs. Mia Matthews; Robert Matthews;
 10 Chartis Property Casualty Company; Deutsche Bank, AG; and
 11 Keith Mahler; is that correct?
 12 A. On advice of ---
 13 MR. SALAZAR: Objection, relevancy. Sorry
 14 to interrupt.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. And through this complaint, Mr. Straub, in
 20 fact, follows through on the discussion in Exhibit 3;
 21 correct?
 22 MR. SALAZAR: Lack of foundation and
 23 relevancy objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. And in this complaint he's suing you for
 4 over \$775,000; correct?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 MR. SALAZAR: Object to the form and
 9 relevancy of that question.
 10 BY MR. LANDAU:
 11 Q. And ultimately Equipment Leasing
 12 International, LLC obtains a judgment against you;
 13 correct?
 14 MR. SALAZAR: Same objection.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. In this packet, I'd ask you to turn to
 20 Exhibit E, which is Bates Stamped Number 333.
 21 Can you tell us what this letter is?
 22 A. On advice of ---
 23 MR. SALAZAR: Objection, relevancy. Sorry.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. Okay. In fact, it's a letter from yourself
 4 to Chartis Insurance; correct?
 5 MR. SALAZAR: Same objection.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. At the bottom of this document, is that your
 11 signature, Ms. Matthews?
 12 MR. SALAZAR: Objection, relevancy.
 13 THE WITNESS: On advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. In fact, it is your signature; correct?
 18 MR. SALAZAR: Same objection, asked and
 19 answered.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. At the top of this document, the address
 25 that you have listed, 115 Lower Church Hill Road,

8 (Pages 29 to 32)

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1 Washington, Connecticut, was that your address at the time
 2 of sending this letter?
 3 MR. SALAZAR: Objection to form and
 4 relevancy.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. What address is that?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Ms. Matthews, are you currently facing
 16 criminal prosecution?
 17 A. On advice of counsel, I'm exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 Q. In fact, currently, you have been indicted
 21 by the U.S. Attorney in Connecticut; correct?
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 Q. You've been indicted for tax evasion;

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1 correct?
 2 A. On advice of counsel, I'm exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.
 5 Q. Mr. Straub has provided you with advice with
 6 regard to your legal problems; correct?
 7 MR. SALAZAR: Objection to form and
 8 relevancy.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. The address here, Lower Church Hill Road,
 14 that relates to the criminal indictment in Connecticut;
 15 correct?
 16 MR. SALAZAR: Objection to form and
 17 relevancy.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. I'd ask you to flip to the last page, Bates
 23 Number 407. Have you ever seen this document before?
 24 A. On advice of counsel, I'm exercising my
 25 rights under the Fifth Amendment and decline to answer the

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1 question.
 2 Q. The document appears to be a check to
 3 Equipment Leasing International, LLC/Glenn Straub. Do you
 4 see that?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 Q. The monies Mr. Straub is receiving here, you
 9 received some of those monies, haven't you?
 10 MR. SALAZAR: Object to the form of the
 11 question and relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. Tell me about Botticelli Advisors.
 17 MR. SALAZAR: Objection to the form of the
 18 question.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. Do you have an interest in that entity?
 24 MR. SALAZAR: Object to the form of the
 25 question and relevancy.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 MR. LANDAU: Let's go ahead and mark this as
 5 Number 5.
 6 (Thereupon, Exhibit Number 5 was marked for
 7 Identification.)
 8 MR. SALAZAR: This is 5. Thank you.
 9 BY MR. LANDAU:
 10 Q. Ms. Matthews, have you seen the document
 11 that we've labelled as Exhibit 5 before?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 Q. The document appears to -- the document
 16 appears to reference a wire transfer from Mr. Straub. Do
 17 you see that?
 18 A. On advice of counsel, I'm exercising my
 19 rights under the Fifth Amendment and decline to answer the
 20 question.
 21 MR. SALAZAR: Object on the grounds of
 22 relevancy.
 23 BY MR. LANDAU:
 24 Q. And, in fact, this wire relates to the loan
 25 and mortgage foreclosure in Nantucket; correct?

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1 MR. SALAZAR: Objection to form and
2 relevancy.
3 THE WITNESS: On advice of counsel, I'm
4 exercising my rights under the Fifth Amendment and decline
5 to answer the question.
6 BY MR. LANDAU:
7 Q. And, in fact, through this wire, Mr. Straub
8 is advancing \$773,277.41, he's advancing that amount of
9 money on your and your husband's behalf; correct?
10 MR. SALAZAR: Object to form and relevancy.
11 THE WITNESS: On advice of counsel, I'm
12 exercising my rights under the Fifth Amendment and decline
13 to answer the question.
14 MR. LANDAU: Okay. Mark this as Exhibit 6.
15 (Thereupon, Exhibit Number 6 was marked for
16 Identification.)
17 BY MR. LANDAU:
18 Q. Ms. Matthews, the document that we've
19 labelled as Exhibit 6, Bates Number 293, have you seen
20 this letter before?
21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.
24 Q. It's a letter from Equipment Leasing
25 International, LLC to Robert W. Matthews; correct?

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1 A. On advice of counsel, I'm exercising my
2 rights under the Fifth Amendment and decline to answer the
3 question.
4 MR. SALAZAR: Sorry, objection on the
5 grounds of relevancy.
6 BY MR. LANDAU:
7 Q. And I think it would be fair to say that
8 this is another demand letter from -- signed by
9 Glenn Straub dated August 28, 2010; correct?
10 MR. SALAZAR: Objection, form and relevancy.
11 THE WITNESS: On advice of counsel, I'm
12 exercising my rights under the Fifth Amendment and decline
13 to answer the question.
14 BY MR. LANDAU:
15 Q. On August 28, 2010, to your knowledge, were
16 you and your husband in default on the loan with Equipment
17 Leasing International, LLC?
18 MR. SALAZAR: Object to form and relevancy.
19 THE WITNESS: On advice of counsel, I'm
20 exercising my rights under the Fifth Amendment and decline
21 to answer the question.
22 BY MR. LANDAU:
23 Q. In fact, your husband was in default on this
24 loan; correct?
25 MR. SALAZAR: Same objection.

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1 THE WITNESS: On advice of counsel, I'm
2 exercising my rights under the Fifth Amendment and decline
3 to answer the question.
4 BY MR. LANDAU:
5 Q. And similarly, you were in default on this
6 loan; correct?
7 MR. SALAZAR: Same objection.
8 THE WITNESS: On advice of counsel, I'm
9 exercising my rights under the Fifth Amendment and decline
10 to answer the question.
11 MR. LANDAU: What are we up to?
12 THE COURT REPORTER: 7.
13 MR. LANDAU: Okay. Let's mark this as 7.
14 (Thereupon, Exhibit Number 7 was marked for
15 Identification.)
16 BY MR. LANDAU:
17 Q. The document that we've labelled as
18 Exhibit 7, and it's Bates Numbered 294, Ms. Matthews, have
19 you seen this document before?
20 MR. SALAZAR: Objection, relevancy.
21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.
24 BY MR. LANDAU:
25 Q. It's, in fact, a letter to Bob Matthews;

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1 correct?
2 A. On advice of ---
3 MR. SALAZAR: Same objection. Sorry.
4 THE WITNESS: On advice of counsel, I'm
5 exercising my rights under the Fifth Amendment and decline
6 to answer the question.
7 BY MR. LANDAU:
8 Q. And the letter is dated September 15, 2010,
9 do you see that?
10 A. On advice of counsel, I'm exercising my
11 rights under the Fifth Amendment and decline to answer the
12 question.
13 MR. SALAZAR: Same objection.
14 BY MR. LANDAU:
15 Q. And, in fact, it's another demand letter
16 from Mr. Straub; correct?
17 MR. SALAZAR: Same objection.
18 THE WITNESS: On advice of counsel, I'm
19 exercising my rights under the Fifth Amendment and decline
20 to answer the question.
21 MR. SALAZAR: Let's go ahead and mark this
22 as Composite 8.
23 (Thereupon, Composite Exhibit Number 8 was
24 marked for Identification.)
25 MR. SALAZAR: 8?

10 (Pages 37 to 40)

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1 MR. LANDAU: Yep.
 2 MR. SALAZAR: More than one, what is it?
 3 MR. LANDAU: It's 8, Composite 8.
 4 MR. SALAZAR: So these three ---
 5 MR. LANDAU: The whole package, yes.
 6 MR. SALAZAR: This here?
 7 MR. LANDAU: Yep.
 8 MR. SALAZAR: Got it. I'm sorry, I just
 9 want to make sure we have the same ones.
 10 MR. LANDAU: Here you go.
 11 MR. MARIANI: Do you have a paperclip by
 12 chance?
 13 MR. LANDAU: Sorry about that.
 14 MR. GEORGE: Right here.
 15 MR. MARIANI: Oh, thanks, David.
 16 BY MR. LANDAU:
 17 Q. Ms. Matthews, the documents we've labelled
 18 as Composite 8 are Bates Numbered 295, 296, and 297. Do
 19 you see that document?
 20 A. On advice of counsel, I'm exercising my
 21 rights under the Fifth Amendment and decline to answer the
 22 question.
 23 Q. Well, no. I asked, do you see the document?
 24 Do you have the document?
 25 A. On advice ---

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1 MR. MARIANI: We have Exhibit -- we have
 2 Exhibit 8.
 3 BY MR. LANDAU:
 4 Q. Do you have the exhibit? Do you have
 5 Exhibit 8?
 6 MR. MARIANI: I will -- I will say I handed
 7 Exhibit 8 to the witness.
 8 BY MR. LANDAU:
 9 Q. Okay, and that Exhibit 8, have you seen that
 10 document before?
 11 MR. SALAZAR: Objection, relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. Ms. Matthews, in fact, it's an e-mail from
 17 Craig Galle to you, personally, Mia Matthews; correct?
 18 MR. SALAZAR: Objection to form and
 19 relevancy.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 MR. LANDAU: What's wrong with the form? I
 24 asked her if it's an e-mail to her?
 25 MR. SALAZAR: I think you asked a little bit

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1 more than that, but I don't think you've established the
 2 predicate necessary for her to answer.
 3 BY MR. LANDAU:
 4 Q. Okay. This is an e-mail to you; correct?
 5 A. On advice of ---
 6 MR. SALAZAR: Object to relevancy. Sorry.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 MR. STRAUB: When are you guys going to take
 11 a break, some kind of idea, before lunch or after lunch,
 12 it's 10:14? I don't need a break, for emergency, but it
 13 would be helpful to know.
 14 MR. SALAZAR: Whenever --
 15 MR. STRAUB: You're in control.
 16 Mr. SALAZAR: -- whenever you want.
 17 MR. LANDAU: Yeah, whenever you want,
 18 Ms. Matthews. I wasn't ---
 19 MR. STRAUB: Your health, anything else,
 20 nobody cares. What do you think, because she can hold up?
 21 MR. LANDAU: I'm just trying to get through
 22 as much, because we have a lot of ground to cover with
 23 Mr. Matthews, too, so I'm just trying to get ---
 24 THE WITNESS: I'm fine.
 25 MR. STRAUB: You're fine, strong girls.

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1 America produces strong girls. Okay. I need to see you
 2 for a second.
 3 MR. SALAZAR: Okay. Can we take a break?
 4 MR. STRAUB: No, no, no, go, go, go. It
 5 wasn't -- I'll text you. I'll make you a little note.
 6 MR. SALAZAR: All right. Sure. Sorry about
 7 that.
 8 THE WITNESS: Are we still on the record?
 9 MR. SALAZAR: Ready when you are.
 10 MR. STRAUB: Sorry to interrupt you.
 11 BY MR. LANDAU:
 12 Q. Ms. Matthews, the document refers to your,
 13 and I'm looking at the second line, default status, do you
 14 see that?
 15 A. On advice of counsel, I'm exercising my
 16 rights under the Fifth Amendment and decline to answer the
 17 question.
 18 Q. And, in fact, you were in default on this
 19 loan at the time of this e-mail, the date of this e-mail;
 20 correct?
 21 MR. SALAZAR: Object to the form and
 22 relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

11 (Pages 41 to 44)

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1 BY MR. LANDAU:
 2 Q. And just so we're clear, 295 is an e-mail
 3 which attaches a letter dated October 7, 2010, and also
 4 a -- the first page of a complaint, with the handwritten
 5 word draft on the top. Do you see that?
 6 MR. SALAZAR: Objection to the form and
 7 relevancy.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. Through this e-mail, Mr. Galle is seeking to
 13 hold you in default on a loan; correct?
 14 MR. SALAZAR: Objection to form and
 15 relevancy.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 MR. LANDAU: Do you have your iPad ready?
 20 MR. SALAZAR: Yeah, I do.
 21 MR. LANDAU: So I'm about to show her a
 22 complaint, a very lengthy complaint, and that's why I
 23 didn't make enough copies. I have a copy for you, but I
 24 had e-mailed Mr. Salazar earlier with a link to -- to the
 25 complaint.

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1 What are we up to?
 2 THE COURT REPORTER: That will be 9.
 3 MR. LANDAU: That will be 9. Okay. Let's
 4 go ahead and mark this Exhibit 9.
 5 (Thereupon, Exhibit Number 9 was marked for
 6 Identification.)
 7 MR. MARIANI: So is that my copy?
 8 MR. LANDAU: Yeah.
 9 MR. MARIANI: Thank you.
 10 MR. LANDAU: David, are you ---
 11 MR. GEORGE: If John has it, anyway it's
 12 from the federal case.
 13 MR. LANDAU: Yep.
 14 MR. SALAZAR: No, it's in the other one.
 15 It's the Palm House one.
 16 MR. GEORGE: Oh, it's the Palm House?
 17 MR. SALAZAR: Yeah.
 18 MR. MARIANI: Let me see that for a second.
 19 THE WITNESS: Uh-huh.
 20 MR. MARIANI: Take a look at it. It's
 21 double sided.
 22 MR. LANDAU: Yes, trying to save trees.
 23 MR. SALAZAR: When it comes time to go to
 24 trial in this thing, if you want to talk to the Judge
 25 about using -- just using iPads, try and cut down on the

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1 copies. We should talk about the logistics, if you want.
 2 MR. LANDAU: Yeah.
 3 John, are we good?
 4 MR. MARIANI: No, I need to get the exhibit
 5 back --
 6 MR. LANDAU: Oh, okay.
 7 MR. MARIANI: -- when David is done with it.
 8 Thank you.
 9 THE WITNESS: Thanks.
 10 BY MR. LANDAU:
 11 Q. Ms. Matthews, the document that we have
 12 labelled Exhibit 9, have you seen this document before?
 13 A. On advice of counsel, I'm exercising my
 14 rights under the Fifth Amendment and decline to answer the
 15 question.
 16 Q. Who was your counsel, your attorney for this
 17 action?
 18 A. On advice ---
 19 MR. MARIANI: Which action?
 20 MR. LANDAU: This complaint.
 21 MR. SALAZAR: Do you want to identify it?
 22 MR. MARIANI: You mean Exhibit 9?
 23 MR. LANDAU: Exhibit 9.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. In fact, it was Louis Mrachek; correct?
 4 A. On advice of counsel, I'm exercising my
 5 rights under the Fifth Amendment and decline to answer the
 6 question.
 7 Q. And if you'd turn -- oh, this doesn't have
 8 Bates numbers on it. Okay. So at the bottom, Page 1 of
 9 44, can you turn to that page?
 10 MR. SALAZAR: The first page of the
 11 complaint, in other words.
 12 MR. LANDAU: Yes, the first page of the
 13 complaint.
 14 MR. SALAZAR: About two pages -- two pages
 15 in maybe, maybe you can help her.
 16 BY MR. LANDAU:
 17 Q. This is a complaint filed by Palm House
 18 Hotel, LLLP against a number of defendants, including
 19 yourself. Do you see that?
 20 A. On advice of counsel, I'm exercising my
 21 rights under the Fifth Amendment and decline to answer the
 22 question.
 23 Q. Okay. Well, the second name in under the
 24 defendants, that's you; correct?
 25 A. On advice of counsel, I'm exercising my

12 (Pages 45 to 48)

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1 rights under the Fifth Amendment and decline to answer the
2 question.

3 Q. And through this complaint, Palm House
4 Hotel, LLLP is basically accusing you of stealing from
5 them. Do you understand that?

6 MR. SALAZAR: Objection to form and
7 relevancy.

8 THE WITNESS: On advice of counsel, I'm
9 exercising my rights under the Fifth Amendment and decline
10 to answer the question.

11 BY MR. LANDAU:

12 Q. In fact, they're asserting claims of
13 fraudulent transfer, RICO, among other claims; isn't that
14 true?

15 MR. SALAZAR: Same objection.

16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.

19 BY MR. LANDAU:

20 Q. I'd ask you to turn to Page 5 of 54 -- 5 of
21 44, and I would refer you to Paragraph 17. It discusses
22 Alibi, LLC. Have you ever heard of that entity Alibi, LLC
23 before?

24 A. On advice of counsel, I'm exercising my
25 rights under the Fifth Amendment and decline to answer the

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1 question.

2 Q. And it discusses that you're the sole and
3 managing member of Alibi, LLC; correct?

4 A. On advice of counsel, I'm exercising my
5 rights under the Fifth Amendment and decline to answer the
6 question.

7 Q. And Alibi, LLC owned a yacht; correct?

8 A. On advice of counsel, I'm exercising my
9 rights under the Fifth Amendment and decline to answer the
10 question.

11 MR. SALAZAR: I'll object on the grounds of
12 relevancy.

13 MR. LANDAU: I'm sorry, just give me one
14 minute.

15 BY MR. LANDAU:

16 Q. Ms. Matthews, the complaint, among other
17 allegations, alleges that you took money that was supposed
18 to be invested in the Palm House Hotel, and instead used
19 those monies to purchase the -- this yacht that's owned by
20 Alibi, LLC. Do you understand that?

21 MR. SALAZAR: Objection, relevancy.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 BY MR. LANDAU:

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1 Q. And, in fact, isn't it true that you did
2 divert funds from -- that otherwise belonged to Palm House
3 Hotel, LLLP, and diverted them in to purchase the yacht?

4 MR. SALAZAR: Objection to form and
5 relevancy.

6 MR. STRAUB: Was it a question?

7 MR. SALAZAR: Was that the end of the
8 question?

9 MR. LANDAU: Yeah.

10 MR. SALAZAR: Okay.

11 MR. STRAUB: Was that a question?

12 MR. SALAZAR: It was.

13 THE WITNESS: On advice of counsel, I'm
14 exercising my rights under the Fifth Amendment and decline
15 to answer the question.

16 MR. STRAUB: I think they're just
17 statements, they're not questions.

18 BY MR. LANDAU:

19 Q. Ms. Matthews, what, if anything, do you know
20 about an entity called Mirabia, LLC?

21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 MR. SALAZAR: Object on relevancy.

25 BY MR. LANDAU:

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1 Q. Did Mirabia, LLC purchase a property located
2 at 149 Brazilian Avenue, Palm Beach, Florida?

3 MR. SALAZAR: Objection, form and relevancy.

4 THE WITNESS: On advice of counsel, I'm
5 exercising my rights under the Fifth Amendment and decline
6 to answer the question.

7 BY MR. LANDAU:

8 Q. In fact, Mirabia did purchase the parcel of
9 real property located at 149 Brazilian Avenue, Palm Beach,
10 Florida; correct?

11 MR. SALAZAR: Same objection.

12 THE WITNESS: On advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.

15 BY MR. LANDAU:

16 Q. And it was purchased with a million dollars
17 of diverted loan funds from Palm House Hotel, LLLP;
18 correct?

19 MR. SALAZAR: Objection, form and relevancy.

20 THE WITNESS: On advice of counsel, I'm
21 exercising my rights under the Fifth Amendment and decline
22 to answer the question.

23 BY MR. LANDAU:

24 Q. Ms. Matthews, if that's not correct, why
25 don't you tell us it's not correct?

13 (Pages 49 to 52)

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1 MR. SALAZAR: Objection to form and
2 relevancy.
3 THE WITNESS: On advice of counsel, I'm
4 exercising my rights under the Fifth Amendment and decline
5 to answer the question.
6 BY MR. LANDAU:
7 Q. If that's not correct, why don't you show us
8 the documents proving it's not correct?
9 MR. SALAZAR: Same objection.
10 THE WITNESS: On advice of counsel, I'm
11 exercising my rights under the Fifth Amendment and decline
12 to answer the question.
13 BY MR. LANDAU:
14 Q. Ms. Matthews, I'd ask you to turn to Page 12
15 of 44 of the complaint.
16 MR. SALAZAR: 12 out of 44.
17 BY MR. LANDAU:
18 Q. And the first allegation at Paragraph 61,
19 are you with me? Are you on the same page?
20 THE WITNESS: On advice ---
21 MR. MARIANI: You said Page 12 of 44?
22 MR. LANDAU: Page 12 of 44, and the first --
23 MR. MARIANI: What paragraph?
24 MR. LANDAU: -- paragraph is 61.
25 MR. MARIANI: Okay. I'll point that out to

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1 the witness.
2 MR. LANDAU: Okay. So we're there?
3 MR. MARIANI: Yes, we're there.
4 BY MR. LANDAU:
5 Q. Ms. Matthews, why don't you read that first
6 allegation for us?
7 MR. MARIANI: Objection to form. The
8 complaint speaks for itself. I'm going to direct the
9 witness not to read the statement.
10 BY MR. LANDAU:
11 Q. Okay. Well, I'll read it. It says, Robert
12 and Maria then proceeded to open up their own bank account
13 in the name of 160 Royal Palm with Regions Bank. Do you
14 see that, Ms. Matthews?
15 MR. SALAZAR: Objection to form, relevancy.
16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.
19 BY MR. LANDAU:
20 Q. In fact, it's true that you did that,
21 correct, Ms. Matthews?
22 A. On advice of counsel ---
23 MR. SALAZAR: Objection to form and relevancy.
24 THE WITNESS: On advice of counsel, I'm
25 exercising my rights under the Fifth Amendment, and

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1 decline to answer the question.
2 BY MR. LANDAU:
3 Q. Then let's jump down to Paragraph 66. Do
4 you want to go ahead and read that for us?
5 MR. MARIANI: I'm going to direct the
6 witness not to read the paragraph, it speaks for itself.
7 BY MR. LANDAU:
8 Q. Okay. I'll read it. For example, on
9 December 27, 2013, Evans transferred \$266,064.60 directly
10 to the Palm Beach County Tax Collector's Office to pay for
11 Robert and Maria's personal real estate taxes.
12 Is that accurate, Ms. Matthews?
13 MR. SALAZAR: Object to form and relevancy.
14 THE WITNESS: On advice of counsel, I'm
15 exercising my rights under the Fifth Amendment and decline
16 to answer the question.
17 BY MR. LANDAU:
18 Q. Did you divert funds from the Palm House
19 Hotel, those \$266,000 and change, to pay your personal
20 real estate taxes?
21 MR. SALAZAR: Object to form and relevancy.
22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.
25 BY MR. LANDAU:

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1 Q. Next paragraph, 67, on January 9, 2014,
2 Evans transferred \$12,452.05 directly to Dovenmuehle
3 Mortgage Company for payment of Robert and Maria's
4 residential mortgage.
5 Ms. Matthews, do you see that paragraph?
6 MR. SALAZAR: Objection, form and relevancy.
7 THE WITNESS: On advice of counsel, I'm
8 exercising my rights under the Fifth Amendment and decline
9 to answer the question.
10 BY MR. LANDAU:
11 Q. Is that true, that over \$12,000 was
12 transferred to -- directly to your mortgage company for
13 the mortgage on your residential home?
14 MR. SALAZAR: Objection to relevancy.
15 THE WITNESS: On advice of counsel, I'm
16 exercising my rights under the Fifth Amendment and decline
17 to answer the question.
18 BY MR. LANDAU:
19 Q. Next paragraph, on June 6, 2014, Evans
20 transferred a million dollars to Mirabia, which was used
21 the same day as deposit on Mirabia's \$5.8 million purchase
22 of the lot adjacent to the hotel located at 149 Brazilian
23 Avenue.
24 Do you see that allegation, Ms. Matthews?
25 MR. SALAZAR: Objection, form and relevancy.

14 (Pages 53 to 56)

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. Is that allegation true, Ms. Matthews?
 6 MR. SALAZAR: Same objection.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. In fact, it is true, correct, Ms. Matthews?
 12 MR. SALAZAR: Same objection.
 13 THE WITNESS: On advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. Let's jump to Page 13 of 44, and
 18 Ms. Matthews, I would refer you to Paragraph 72 of the
 19 complaint. Are you there?
 20 MR. MARIANI: I'll point out Paragraph 72 to
 21 the witness.
 22 MR. LANDAU: Okay.
 23 BY MR. LANDAU:
 24 Q. And Paragraph 72 says, additionally, Robert
 25 and Maria, meaning Maria Matthews, had the following

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1 amounts transferred into the Regions account, which are
 2 attributed to loan funds, and there is then a chart
 3 totalling approximately \$9.5 million. Do you see that?
 4 MR. SALAZAR: Object to form and relevancy.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. And isn't it true that the monies identified
 10 in Paragraph 72 are monies that were diverted for your
 11 personal benefit?
 12 MR. SALAZAR: Object to form and relevancy.
 13 THE WITNESS: On the advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. Ms. Matthews, did you pay taxes on those
 18 funds?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On the advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. In fact, isn't it true you did not pay taxes
 25 on those funds?

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1 MR. SALAZAR: Same objection.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. The funds identified in Paragraph 72, can
 7 you tell us where those funds went and what they were used
 8 for?
 9 MR. SALAZAR: Same objection.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. These were funds that were supposed to be
 15 used for the construction of 160 Royal Palm, LLC; correct?
 16 MR. SALAZAR: Objection to form --
 17 THE WITNESS: On advice --
 18 MR. SALAZAR: -- relevancy.
 19 THE WITNESS: -- of counsel, I'm exercising
 20 my rights under the Fifth Amendment and decline to answer
 21 the question.
 22 BY MR. LANDAU:
 23 Q. Ms. Matthews, I'd ask you to turn to Page 15
 24 of 44. Are you there?
 25 MR. MARIANI: We have Page 15. Is there a

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1 paragraph you're interested in?
 2 MR. LANDAU: Yes, and I would direct your
 3 attention to Paragraph 80.
 4 MR. MARIANI: Okay. I've pointed that out
 5 to the witness.
 6 BY MR. LANDAU:
 7 Q. Paragraph 80 reads, additionally, on May 27,
 8 2014, a check in the amount of \$1,100,000 was issued on
 9 the Regions account payable to Bonaventure, a company
 10 owned by Maria and Robert. Do you see that?
 11 MR. SALAZAR: Objection, relevancy.
 12 THE WITNESS: On the advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. Is there anything stated in Paragraph 80
 17 that is incorrect?
 18 MR. SALAZAR: Objection to form and
 19 relevancy.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Is there anything stated in that paragraph
 25 that is false?

15 (Pages 57 to 60)

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1 MR. SALAZAR: Form and relevancy objection.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. In fact, everything stated in Paragraph 80
 7 is correct, and true, and accurate; correct?
 8 MR. SALAZAR: Form, relevancy, and asked and
 9 answered objection.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. The \$1,100,000 identified here is money that
 15 was supposed to go to the construction of the Palm House
 16 Hotel; correct?
 17 MR. SALAZAR: Objection, form and relevancy.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. And, in fact, that money, \$1,100,000, did
 23 not go to the Palm House Hotel; correct?
 24 MR. SALAZAR: Same objection.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. Ms. Matthews, can you explain to us where
 5 the \$1,100,000 went and what it was used for?
 6 MR. SALAZAR: Objection to form, relevancy.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. The paragraph refers to a company called
 12 Bonaventure. Can you tell us what Bonaventure is?
 13 A. On advice of counsel, I'm exercising my
 14 rights under the Fifth Amendment and decline to answer the
 15 question.
 16 Q. You are or were an owner of Bonaventure;
 17 correct?
 18 MR. SALAZAR: Objection, relevancy.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. I'd refer you to Paragraphs 82 and 83. Are
 24 you there?
 25 MR. MARIANI: I've pointed them out to the

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1 witness.
 2 BY MR. LANDAU:
 3 Q. Is there anything in those paragraphs that
 4 is not accurate?
 5 MR. SALAZAR: Objection to form and
 6 relevancy.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. Is there anything in Paragraphs 82 and 83
 12 that are not true and correct?
 13 MR. SALAZAR: Same objection.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. In fact, everything in Paragraphs 82 and 83
 19 are true and correct, yes?
 20 MR. SALAZAR: Same objection.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. Ms. Matthews, in Paragraph 83, it discusses,

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1 and I'm quoting "a total of \$2,272,728.33 was paid from
 2 the Regions account to pay for the purchase of the yacht
 3 and related expenses." Do you see that?
 4 A. On the ---
 5 MR. SALAZAR: Object to form, relevancy.
 6 THE WITNESS: On the advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. Can you explain to us what those funds were
 11 used for?
 12 MR. SALAZAR: Objection, foundation and
 13 relevancy.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. Isn't it true that those funds were not used
 19 for the renovation or -- or construction of the Palm House
 20 Hotel?
 21 MR. SALAZAR: Same objection.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

16 (Pages 61 to 64)

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1 Q. I'd ask you to turn to Page 17 of 44.
 2 MR. MARIANI: Which paragraph?
 3 BY MR. LANDAU:
 4 Q. And I'd refer your attention -- direct your
 5 attention to Paragraph 90, and that paragraph begins, a
 6 summary of the funds disbursed by either the Evans' firm's
 7 IOLTA account, do you see that?
 8 MR. MARIANI: I've pointed that out to the
 9 witness.
 10 MR. LANDAU: Okay.
 11 BY MR. LANDAU:
 12 Q. And below that, there is a chart of -- of
 13 monies.
 14 Have you pointed that out to the witness?
 15 MR. MARIANI: Yes.
 16 MR. LANDAU: Okay.
 17 BY MR. LANDAU:
 18 Q. Ms. Matthews, is there anything in
 19 Paragraph 90 that is not true and correct?
 20 MR. SALAZAR: Object to the form and
 21 relevancy.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. In fact, everything in Paragraph 90 is true,
 2 correct and accurate; correct?
 3 MR. SALAZAR: Same objection.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. The chart totals \$24,452,665.84. Do you see
 9 that?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 expressing my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. You diverted over \$24 million in funds that
 16 were supposed to be used for the Palm House Hotel project;
 17 correct?
 18 MR. SALAZAR: Same objection.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. Can you explain to us what happened to this
 24 \$24 million?
 25 MR. SALAZAR: Objection, form and relevancy.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. So, for the record, you're refusing to
 6 explain what happened to this \$24 million?
 7 MR. SALAZAR: Objection, form and relevancy.
 8 THE WITNESS: On advice of counsel, I am
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. Ms. Matthews, I'd ask you to turn to Page 20
 13 of 44.
 14 MR. MARIANI: Which paragraph?
 15 BY MR. LANDAU:
 16 Q. And I direct your attention to 106, 106.
 17 MR. MARIANI: I've pointed that out to the
 18 witness.
 19 BY MR. LANDAU:
 20 Q. Is there anything in Paragraph 106 that is
 21 not true or correct?
 22 MR. SALAZAR: Object to the form and
 23 relevancy.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. In fact, everything in Paragraph 106 is
 4 true, correct and accurate; is that correct?
 5 MR. SALAZAR: Same objection.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. That paragraph refers to \$5 million in loan
 11 funds that were used for your personal use, that's the
 12 allegation.
 13 Can you tell us what happened to those -- to
 14 that \$5 million?
 15 MR. SALAZAR: Object to the form and
 16 relevancy.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. So you're refusing to tell us the
 22 whereabouts of that \$5 million or what happened to it?
 23 MR. SALAZAR: Objection to form, relevancy.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

17 (Pages 65 to 68)

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1 to answer the question.
 2 MR. GEORGE: Excuse me, Phil, what paragraph
 3 are you referring to?
 4 MR. LANDAU: 106.
 5 MR. GEORGE: Thank you.
 6 BY MR. LANDAU:
 7 Q. Next Paragraph, 107, do you see 107?
 8 MR. MARIANI: I've pointed that out to the
 9 witness.
 10 BY MR. LANDAU:
 11 Q. 107 reads, the loan funds have also been
 12 fraudulently used by 160 Royal Palm to purchase a new
 13 Maserati automobile for Maria's exclusive use.
 14 Is that true, Ms. Matthews?
 15 MR. SALAZAR: Objection, relevancy.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. Has Mr. Straub driven with you in that
 21 Maserati?
 22 MR. SALAZAR: Objection, form,
 23 argumentative, irrelevant.
 24 THE WITNESS: On the advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. Did Mr. Straub help you purchase or help you
 4 pick out that Maserati?
 5 MR. SALAZAR: Objection, irrelevant, lack of
 6 foundation.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. In fact, isn't it true that Mr. Straub
 12 helped you pick out the Maserati that's referred to in
 13 Paragraph 107?
 14 MR. SALAZAR: I'm going to object on the
 15 grounds of lack of foundation --
 16 BY MR. LANDAU:
 17 Q. Okay. You can answer.
 18 MR. SALAZAR: -- relevancy, and the fact
 19 that you have no basis to even ask that question or even
 20 sure whether that's true.
 21 BY MR. LANDAU:
 22 Q. You can answer.
 23 A. On advice of counsel, I'm exercising my
 24 rights under the Fifth Amendment and decline to answer the
 25 question.

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1 MR. MARIANI: Excuse me, Counsel, how much
 2 longer with this document?
 3 MR. LANDAU: I don't know.
 4 MR. MARIANI: How about if we -- is it a
 5 convenient time for a break?
 6 MR. LANDAU: Absolutely.
 7 MR. MARIANI: Okay. Let's do that.
 8 (Thereupon, a brief recess was taken, after
 9 which the following proceedings were had:)
 10 BY MR. LANDAU:
 11 Q. Ms. Matthews, I'd ask you to jump to -- I
 12 pulled this out of order, let's make sure we're correct.
 13 Can you jump to Exhibit D in this complaint?
 14 MR. SALAZAR: Do you know what document that
 15 is, by any chance?
 16 MR. LANDAU: It's a Les Evans QuickBooks
 17 Quick report.
 18 BY MR. LANDAU:
 19 Q. Ms. Matthews, is there any point in time
 20 where you lived with Mr. Straub?
 21 MR. SALAZAR: Object to the form and
 22 relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. In fact, there's been -- there has been a
 3 point in time where you've lived with Mr. Straub; correct?
 4 MR. SALAZAR: Same objection.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 MR. SALAZAR: Pardon me, did you say -- what
 9 exhibit did you say, D?
 10 MR. LANDAU: I think -- is it D, or is it C
 11 or D? It might be C.
 12 MR. MARIANI: Do you know how far from the
 13 end of the document it is?
 14 MR. LANDAU: Well, all the exhibits are at
 15 the end, they're in alphabetical order
 16 MR. MARIANI: No, I understand that, but
 17 there is no full exhibit page.
 18 MR. LANDAU: Which exhibit is that?
 19 MR. SALAZAR: C.
 20 MR. MARIANI: You're changing now from D to
 21 C?
 22 MR. LANDAU: It's C, C. I said it was
 23 either C or D. I pulled it out of order, I apologize.
 24 MR. MARIANI: Do you know how many pages the
 25 exhibit is?

18 (Pages 69 to 72)

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1 MR. LANDAU: I'm holding two double-side
2 pages.
3 MR. MARIANI: No, but are they numbered?
4 MR. LANDAU: They are not. It's just behind
5 Exhibit C.
6 John, do you want me to flip through it and
7 find it?
8 MR. MARIANI: Here, yeah, do it.
9 MR. LANDAU: Yep, thanks. Here we go.
10 Yeah.
11 MR. MARIANI: Okay.
12 BY MR. LANDAU:
13 Q. Ms. Matthews, I'm showing you Exhibit C of
14 this complaint. Have you ever seen this document before?
15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.
18 Q. Exhibit C is a QuickBooks Quick Report of
19 Les Evans' trust account; correct?
20 MR. SALAZAR: Object to form and relevancy.
21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.
24 BY MR. LANDAU:
25 Q. And at the top of the document it says,

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1 First United IOLTA, and under that Matthews, Palm House.
2 Do you see that?
3 MR. SALAZAR: Objection to form and
4 relevancy.
5 THE WITNESS: On advice of counsel, I'm
6 exercising my rights under the Fifth Amendment and decline
7 to answer the question.
8 BY MR. LANDAU:
9 Q. And, in fact -- well, can you tell us what
10 these -- what these amounts represent?
11 MR. SALAZAR: Objection to form and
12 relevancy.
13 THE WITNESS: On advice of counsel, I'm
14 exercising my rights under the Fifth Amendment and decline
15 to answer the question.
16 BY MR. LANDAU:
17 Q. So, for example, there's a check, and it's
18 dated March 28, 2014, Check Number 11237, and it says it
19 was paid to tax collector, Palm Beach, \$180,460. Do you
20 see that?
21 MR. SALAZAR: Object to form, relevancy.
22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.
25 BY MR. LANDAU:

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1 Q. And that check was for the payment of your
2 personal property taxes that we discussed earlier;
3 correct?
4 MR. SALAZAR: Objection, form, relevancy.
5 THE WITNESS: On advice of counsel, I'm
6 exercising my rights under the Fifth Amendment and decline
7 to answer the question.
8 BY MR. LANDAU:
9 Q. Further down, April 18, 2014, there are two
10 wires to Dovenmuehle Mortgage, one in the amount of
11 \$92,700, and another in the amount of \$42,300.
12 Those amounts are for payment of your
13 personal mortgage on your personal home; correct?
14 A. On advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.
17 Q. Ms. Matthews, any of the checks that are
18 referenced on this exhibit, is it your position that --
19 were any of them not, in fact, paid?
20 A. On advice of counsel, I'm exercising my
21 rights under the Fifth Amendment and decline to answer the
22 question.
23 MR. SALAZAR: I apologize, I didn't realize
24 that was the end of the question.
25 Objection to form and relevancy.

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1 BY MR. LANDAU:
2 Q. You were personally involved in each one of
3 the wires, and checks, and payments referenced in this
4 exhibit; correct?
5 MR. SALAZAR: Objection to form and
6 relevancy.
7 THE WITNESS: On advice of counsel, I'm
8 exercising my rights under the Fifth Amendment and decline
9 to answer the question.
10 BY MR. LANDAU:
11 Q. Is there anything in this exhibit -- in this
12 exhibit that is not accurate?
13 MR. SALAZAR: Objection to form, relevancy.
14 THE WITNESS: On advice of counsel, I am
15 exercising my rights under the Fifth Amendment and decline
16 to answer the question.
17 BY MR. LANDAU:
18 Q. Ms. Matthews, the sale of the property
19 behind the hotel, the Mirabia transaction, you executed
20 that deed, didn't you?
21 MR. SALAZAR: Objection to form and
22 relevancy.
23 THE WITNESS: On advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

19 (Pages 73 to 76)

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1 BY MR. LANDAU:
 2 Q. And the attorney that was involved in that
 3 transaction was Craig Galle; correct?
 4 MR. SALAZAR: Objection to relevance.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. And Mr. Galle is Mr. Straub's attorney;
 10 correct?
 11 MR. SALAZAR: Objection to form and
 12 relevancy.
 13 THE WITNESS: On advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. In fact, Mr. Straub was aware of that
 18 transaction; correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On advice of counsel, I am
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Ms. Matthews, who is paying for Mr. Mariani
 25 to be here today to represent you?

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1 MR. SALAZAR: Objection to form and
 2 relevancy.
 3 THE WITNESS: On advice of counsel, I am
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. LANDAU:
 7 Q. Does Mr. Galle ever serve as your attorney?
 8 MR. SALAZAR: Objection to form and
 9 relevancy.
 10 THE WITNESS: On advice of counsel, I am
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. In fact, Mr. Galle has served as your
 15 attorney, hasn't he?
 16 MR. SALAZAR: Same objection.
 17 THE WITNESS: On advice of counsel, I am
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. Mr. Galle has reviewed documents for you,
 22 correct, legal documents?
 23 MR. SALAZAR: Same objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. We'll get to it in a little bit, but in the
 4 text messages that you produced ---
 5 MR. MARIANI: Excuse me, Counsel.
 6 MR. LANDAU: Yes.
 7 MR. MARIANI: Can I ask you not to point at
 8 the witness?
 9 MR. LANDAU: I'm sorry, I apologize.
 10 MR. MARIANI: Thank you.
 11 BY MR. LANDAU:
 12 Q. In -- in the text messages that you
 13 produced, they discuss that you've asked Mr. Straub if you
 14 could -- if Mr. Galle, Craig Galle, could review certain
 15 documents for you; isn't that correct?
 16 MR. SALAZAR: Object to form and relevancy.
 17 THE WITNESS: On advice of counsel, I am
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. And when Mr. Galle -- and Mr. Galle did, in
 22 fact, review documents for you; correct?
 23 MR. SALAZAR: Same objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. And when Mr. Galle reviewed those documents,
 4 did he charge you?
 5 MR. SALAZAR: Same objection.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. In fact, Mr. Galle did not charge you any
 11 money; correct?
 12 MR. SALAZAR: Same objection.
 13 THE WITNESS: On the advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. Instead, Mr. Straub pays for Mr. Galle's
 18 services in representing you; correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On the advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Mr. Straub pays for a lot of things for you,
 25 doesn't he?

20 (Pages 77 to 80)

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1 MR. SALAZAR: Object to form, relevancy.
 2 THE WITNESS: On the advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. He's let you use a car; correct?
 7 MR. SALAZAR: Objection to form and
 8 relevancy.
 9 THE WITNESS: On the advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 MR. LANDAU: Let's -- I want to make sure we
 13 get this crystal -- straight. What's wrong with the form?
 14 MR. SALAZAR: I think there is a lack of a
 15 predicate and ---
 16 MR. LANDAU: Okay. Well, she's pleading the
 17 Fifth --
 18 MR. SALAZAR: That doesn't mean you can
 19 just ---
 20 MR. LANDAU: -- so the Court can draw a
 21 negative inference.
 22 MR. SALAZAR: Do what you want to do.
 23 MR. LANDAU: Okay.
 24 MR. SALAZAR: I just don't think you've
 25 established any type of predicate for your questions

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1 whatsoever.
 2 MR. LANDAU: Okay.
 3 MR. SALAZAR: And they're certainly not
 4 relevant to this motion that we ---
 5 MR. LANDAU: Oh, I certainly think they are.
 6 BY MR. LANDAU:
 7 Q. Ms. Matthews, has Mr. Straub ever loaned you
 8 a vehicle for your use?
 9 MR. SALAZAR: Objection, relevancy.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. In fact, Mr. Straub has loaned you a vehicle
 15 for your use; correct?
 16 MR. SALAZAR: Same objection.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. Has Mr. Straub ever loaned a vehicle for
 22 Robert Matthews' use?
 23 MR. SALAZAR: Objection to form and
 24 relevancy.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 MR. LANDAU: What was wrong with the form?
 4 MR. SALAZAR: Again, you haven't established
 5 any foundation for those questions.
 6 MR. LANDAU: I don't understand that.
 7 MR. SALAZAR: You haven't established
 8 personal knowledge, you haven't established what ---
 9 MR. LANDAU: Personal knowledge, I asked
 10 have -- okay.
 11 BY MR. LANDAU:
 12 Q. In fact, Ms. Matthews, isn't it true that
 13 Mr. Straub has loaned a vehicle to your husband,
 14 Robert Matthews, for his use?
 15 MR. SALAZAR: Same objection.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. Has Mr. Straub ever let you use a credit
 21 card of his?
 22 MR. SALAZAR: Objection to form and
 23 relevancy.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. In fact, isn't it true that Mr. Straub has
 4 let you use a credit card that belonged to him?
 5 MR. SALAZAR: Object to form and relevancy.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. When was the last time Mr. Straub let you
 11 use one of his credit cards?
 12 MR. SALAZAR: Objection to form and
 13 relevancy.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. Isn't it true that as of this day,
 19 Mr. Straub continues to allow you to use his credit cards?
 20 MR. SALAZAR: Objection to form and
 21 relevancy.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 MR. LANDAU: What are we up to, what number?

21 (Pages 81 to 84)

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1 THE COURT REPORTER: 10.
 2 MR. GEORGE: 10.
 3 MR. LANDAU: Let's go ahead and mark this as
 4 Exhibit 10.
 5 (Thereupon, Exhibit Number 10 was marked for
 6 Identification.)
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, the document that we have
 9 identified or marked as Exhibit 10, have you seen this
 10 document before?
 11 A. On advice of counsel, I'm exercising my
 12 rights under the Fifth Amendment and decline to answer the
 13 question.
 14 Q. Ms. Matthews, isn't it true that the
 15 document that we've marked as Exhibit 10 is a lawsuit
 16 where West Coast Investors, LLC is the plaintiff, and you
 17 and your husband are the defendants?
 18 MR. SALAZAR: Objection, relevancy.
 19 THE WITNESS: On advice of counsel, I am
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. Do you know who West Coast Investors, LLC
 24 is?
 25 A. On advice of counsel, I am exercising my

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1 rights under the Fifth Amendment and decline to answer the
 2 question.
 3 Q. Isn't it true that West Coast Investors, LLC
 4 is a company that's owned either wholly or in part by
 5 Mr. Glenn Straub?
 6 MR. SALAZAR: Objection to form and
 7 relevancy.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. And in this lawsuit, West Coast Investors is
 13 suing you for several loans made by Mr. Straub; isn't that
 14 correct?
 15 MR. SALAZAR: Objection to form.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. In fact, if you -- Ms. Matthews, I'd ask you
 21 to turn to Paragraph 12 the complaint.
 22 MR. MARIANI: I've pointed that paragraph
 23 out to the witness, Counsel.
 24 MR. LANDAU: Okay.
 25 BY MR. LANDAU:

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1 Q. Is anything in Paragraph 12 not correct?
 2 MR. SALAZAR: Objection to form, relevancy.
 3 THE WITNESS: On advice of counsel, I am
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. LANDAU:
 7 Q. In fact, everything in Paragraph 12 is true
 8 and correct, isn't that true?
 9 MR. SALAZAR: Same objection.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. Everything in this complaint is true and
 15 correct, isn't that true, Ms. Matthews?
 16 MR. SALAZAR: Form and relevancy objection.
 17 THE WITNESS: On advice of counsel, I am
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. Ms. Matthews, can you point out to us any
 22 allegation in this complaint that is not true or correct?
 23 MR. SALAZAR: Objection to form and
 24 relevancy.
 25 THE WITNESS: On advice of counsel, I am

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. I'd ask you, Ms. Matthews, to turn to the
 5 exhibits behind this complaint. Let's go to Exhibit 1.
 6 MR. SALAZAR: We're done with the big one
 7 for now, Number 9? I can turn it off?
 8 MR. LANDAU: Yeah, yeah, yeah.
 9 MR. MARIANI: We're at Exhibit 1.
 10 BY MR. LANDAU:
 11 Q. Okay. Ms. Matthews, have you seen Exhibit 1
 12 before?
 13 A. On advice of counsel, I am exercising my
 14 rights under the Fifth Amendment and decline to answer the
 15 question.
 16 Q. So I'll take that that you have seen this
 17 document before; correct?
 18 MR. SALAZAR: Objection to form, relevancy.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment to decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. And so, let's walk through it. Letter A
 24 refers to -- well, first of all, this is an assignment of
 25 certain claims, but they refer to the assignment of claims

22 (Pages 85 to 88)

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1 of a loan dated May 28, 2018, of a hundred and fifty
2 thousand dollars to Maria Matthews and Robert Matthews, do
3 you see that?

4 A. On advice of counsel, I'm exercising my
5 rights under the Fifth Amendment and decline to answer the
6 question.

7 Q. And on May 28, 2018, in fact, Mr. Straub,
8 through Palm Beach Polo, Inc., did loan you and your
9 husband a hundred and fifty thousand dollars; isn't that
10 correct?

11 MR. SALAZAR: Objection, relevancy.

12 THE WITNESS: On the advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.

15 MR. MARIANI: Excuse me for a second
16 counsel. (Confers with witness.)

17 MR. LANDAU: Sure.

18 MR. MARIANI: Go ahead.

19 BY MR. LANDAU:

20 Q. I'm sorry, I pointed again. That's a bad
21 habit.

22 Ms. Matthews, you're aware your husband is
23 currently in a Chapter 11 bankruptcy proceeding; correct?

24 A. On advice of counsel, I'm exercising my
25 rights under the Fifth Amendment and decline to answer the

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1 question.

2 Q. Ms. Matthews, the hundred and fifty thousand
3 dollar loan that we just discussed on May 28, 2018 that's
4 referred to in this Exhibit 1, do you know if that loan is
5 disclosed in your husband's bankruptcy schedules?

6 MR. SALAZAR: Objection, relevancy.

7 THE WITNESS: On advice of counsel, I'm
8 exercising my rights under the Fifth Amendment and decline
9 to answer the question.

10 BY MR. LANDAU:

11 Q. In fact, isn't it true that this loan is not
12 referenced in your husband's bankruptcy schedules?

13 MR. SALAZAR: Same objection.

14 THE WITNESS: On the advice of counsel, I'm
15 exercising my rights under the Fifth Amendment and decline
16 to answer the question.

17 BY MR. LANDAU:

18 Q. Letter B, June 1, 2018, loan to
19 Maria S. Matthews, a hundred twenty-five thousand dollars.
20 Is that correct, was there a loan made on June 1, 2018, to
21 you of a hundred and twenty-five thousand dollars?

22 MR. SALAZAR: Objection, relevancy.

23 THE WITNESS: On the advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

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1 BY MR. LANDAU:

2 Q. In fact, that loan was made to you; correct?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 MR. SALAZAR: Same objection.

7 BY MR. LANDAU:

8 Q. That loan of a hundred and twenty-five
9 thousand dollars to you, was that loan disclosed on your
10 husband's bankruptcy schedules?

11 MR. SALAZAR: Same objection.

12 THE WITNESS: On the advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.

15 BY MR. LANDAU:

16 Q. In fact, that loan was not disclosed on your
17 husband's bankruptcy schedules; isn't that true?

18 MR. SALAZAR: Same objection.

19 THE WITNESS: On the advice of counsel, I'm
20 exercising my rights under the Fifth Amendment and decline
21 to answer the question.

22 BY MR. LANDAU:

23 Q. Letter C, May 2018, unauthorized use of
24 credit card claim, \$50,000. Do you see that?

25 A. On advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
2 question.

3 Q. So you did use Mr. Straub's credit cards to
4 the tune of \$50,000 without his permission; correct?

5 MR. SALAZAR: Objection, relevancy.

6 THE WITNESS: On the advice of counsel, I'm
7 exercising my rights under the Fifth Amendment and decline
8 to answer the question.

9 BY MR. LANDAU:

10 Q. This unauthorized use of credit card claim,
11 \$50,000, what was that \$50,000 used for?

12 MR. SALAZAR: Objection, relevancy.

13 THE WITNESS: On the advice of counsel, I'm
14 exercising my rights under the Fifth Amendment and decline
15 to answer the question.

16 BY MR. LANDAU:

17 Q. That \$50,000 represents purchases made for
18 the benefit of your husband, Robert Matthews; isn't that
19 true?

20 MR. SALAZAR: Objection, relevancy.

21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 BY MR. LANDAU:

25 Q. And those \$50,000 in purchases for the

23 (Pages 89 to 92)

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1 benefit of your husband were never disclosed to the
 2 Bankruptcy Court; correct?
 3 MR. SALAZAR: Objection, relevancy.
 4 THE WITNESS: On the advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, do you find this amusing?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. I'd ask you to flip to Exhibit 2.
 13 Ms. Matthews, have you seen this document before?
 14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 Q. In fact, Ms. Matthews, this -- this is a
 18 promissory note evidencing a loan from Palm Beach Polo,
 19 LLC to yourself, Maria Matthews, for a hundred fifty
 20 thousand dollars; isn't that correct?
 21 MR. SALAZAR: Objection, relevancy.
 22 THE WITNESS: On the advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. And I'd ask you to flip to the next page,
 2 Page Number 2 of the promissory note. There is a
 3 signature at the bottom, and it seems to be your
 4 signature. Is that your signature?
 5 MR. SALAZAR: Objection, relevancy.
 6 THE WITNESS: On the advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. In fact, that is your signature; correct?
 11 MR. SALAZAR: Same objection.
 12 THE WITNESS: On the advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. I'd ask you to turn to the next page and
 17 that's a document titled security agreement.
 18 John, are you pointing that out to her?
 19 MR. MARIANI: Yes, we have that in front of
 20 us.
 21 MR. LANDAU: Okay.
 22 BY MR. LANDAU:
 23 Q. Ms. Matthews, have you ever seen this
 24 agreement before, this security agreement?
 25 MR. SALAZAR: Objection, relevancy.

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1 THE WITNESS: On the advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. And if you flip to the second page of this
 6 agreement, that's your signature; correct? You signed
 7 this agreement?
 8 MR. SALAZAR: Same objection.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. I'd ask you to flip to the next page titled
 14 loan agreement.
 15 MR. MARIANI: We have that in front of us.
 16 BY MR. LANDAU:
 17 Q. Have you seen this loan agreement before,
 18 Ms. Matthews?
 19 A. On the advice of counsel, I'm exercising my
 20 rights under the Fifth Amendment and decline to answer the
 21 question.
 22 MR. SALAZAR: Objection, relevancy.
 23 BY MR. LANDAU:
 24 Q. The signature under holder, that is your
 25 signature; correct?

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1 MR. SALAZAR: Objection, relevancy.
 2 THE WITNESS: On the advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. And in Paragraph 1 of this loan agreement,
 7 it requires you to deliver a bill of sale to Alec Domb,
 8 P.A. to hold as escrow agent. Do you see that?
 9 MR. SALAZAR: Objection, relevancy.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. And if you flip to the following page, there
 15 is a document titled bill of sale. Do you see that
 16 document?
 17 MR. MARIANI: We have that in front of us.
 18 BY MR. LANDAU:
 19 Q. Ms. Matthews, have you seen this document
 20 before?
 21 MR. SALAZAR: Relevancy objection.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

24 (Pages 93 to 96)

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1 Q. And you've signed this document as seller;
2 correct?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 MR. SALAZAR: Same objection.

7 BY MR. LANDAU:

8 Q. Do you understand what the purpose of this
9 document is?

10 MR. SALAZAR: Objection, relevance.

11 THE WITNESS: On advice of counsel, I am
12 exercising my rights under the Fifth Amendment and decline
13 to answer the question.

14 BY MR. LANDAU:

15 Q. Through this document, if you look at
16 Paragraph 1, it appears to be that you are selling to
17 Palm Beach Polo, Inc. all of the personal property
18 described on Exhibit A to this agreement. Do you see
19 that?

20 MR. SALAZAR: Objection, relevancy.

21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 BY MR. LANDAU:

25 Q. Now, there's no Exhibit A. Can you tell us

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1 what Exhibit A was?

2 MR. SALAZAR: Objection, relevancy.

3 THE WITNESS: On advice of counsel, I am
4 exercising my rights under the Fifth Amendment and decline
5 to answer the question.

6 BY MR. LANDAU:

7 Q. In fact, the purpose of this agreement, this
8 whole loan agreement and security agreement, is to give
9 Palm Beach Polo a lien on certain assets of yours; isn't
10 that correct?

11 A. On advice of counsel, I'm exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 MR. SALAZAR: Objection, relevancy.

15 MR. LANDAU: Oh, I think it's very relevant.

16 BY MR. LANDAU:

17 Q. Ms. Matthews, back to Exhibit 9, which is
18 the Palm House, LLLP complaint.

19 Let's flip to Exhibit F, F as in Frank.

20 MR. SALAZAR: What is that document so I can
21 try to find it?

22 MR. LANDAU: It's a QuickBooks report.

23 MR. MARIANI: Counselor, did you say
24 Exhibit F?

25 MR. LANDAU: F as in Frank, yes.

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1 MR. MARIANI: Yes, we have that.

2 BY MR. LANDAU:

3 Q. And, Ms. Matthews, I would ask if you've
4 ever seen this document that's at Exhibit F? Have you
5 ever seen this document before?

6 A. On advice of counsel, I'm exercising my
7 rights under the Fifth Amendment and decline to answer the
8 question.

9 Q. In fact, you have seen this document before,
10 haven't you?

11 A. On advice of counsel, I'm exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 Q. And you have personal knowledge as to the
15 contents of this document, do you not?

16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.

19 Q. Ms. Matthews, are there any transactions
20 identified in this document that are not accurate?

21 MR. SALAZAR: Object to form and relevance.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 BY MR. LANDAU:

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1 Q. In fact, isn't it true that every one of the
2 transactions identified in this document are true and
3 accurate?

4 MR. SALAZAR: Same objection.

5 THE WITNESS: On advice of counsel, I'm
6 exercising my rights under the Fifth Amendment and decline
7 to answer the question.

8 BY MR. LANDAU:

9 Q. Let's look at the first page of this
10 document, Exhibit F. Oh, and I'm sorry, for the record,
11 Exhibit F is a QuickBooks report.

12 Ms. Matthews, isn't it correct that this
13 document, Exhibit F, is a QuickBooks report illustrating
14 transactions from a Regions checking account?

15 MR. SALAZAR: Objection, relevancy.

16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.

19 BY MR. LANDAU:

20 Q. Okay, and I turn your attention to -- in the
21 beginning, a handful of transactions down, there is a
22 check on -- it's hard to read, it appears to be
23 November 28, 2013, Check Number 1001, Trump International
24 Golf Club for just over \$23,000. Do you see that?

25 A. On advice of counsel, I'm exercising my

25 (Pages 97 to 100)

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1 rights under the Fifth Amendment and decline to answer the
2 question.

3 Q. Do you have use of the Trump International
4 Golf Club?

5 MR. SALAZAR: Objection to relevancy.

6 THE WITNESS: On advice of counsel, I'm
7 exercising my rights under the Fifth Amendment and decline
8 to answer the question.

9 BY MR. LANDAU:

10 Q. In November of 2013, you did, in fact, have
11 use of the Trump International Golf Club; isn't that
12 right?

13 MR. SALAZAR: Objection, relevancy.

14 THE WITNESS: On advice of counsel, I'm
15 exercising my rights under the Fifth Amendment and decline
16 to answer the question.

17 BY MR. LANDAU:

18 Q. And this amount represents a transfer from
19 funds that belong to the EB-5 investors; isn't that
20 correct?

21 MR. SALAZAR: Objection, relevancy.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 BY MR. LANDAU:

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1 Q. Same question for the next transaction,
2 November 26, 2013, Check Number -- it looks like 1002, the
3 Mar-a-Lago Club, 13,000 and change.

4 MR. SALAZAR: Same objection.

5 BY MR. LANDAU:

6 Q. In November of 2013, did you have use of the
7 Mar-a-Lago Club?

8 MR. SALAZAR: Same objection.

9 THE WITNESS: On advice of counsel, I'm
10 exercising my rights under the Fifth Amendment and decline
11 to answer the question.

12 BY MR. LANDAU:

13 Q. In fact, you did have use of the Mar-a-Lago
14 Club, did you not?

15 MR. SALAZAR: Same objection.

16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.

19 BY MR. LANDAU:

20 Q. And these roughly \$13,000 were monies that
21 were diverted from EB-5 investments; isn't that true?

22 MR. SALAZAR: Same objection.

23 THE WITNESS: On advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

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1 MR. LANDAU: John, if you can turn to -- I
2 know it's hard to see -- the transactions dated May of
3 2014?

4 MR. MARIANI: Which one?

5 MR. LANDAU: And do you see where there's a
6 payment of a hundred fifty thousand dollars to
7 Lawrence Moens, it says consultant?

8 MR. SALAZAR: What day is that, 5 what?

9 MR. LANDAU: It looks like 5/12/2014, and
10 there's -- it looks like Check Number 1079.

11 MR. MARIANI: Say the amount again.

12 MR. LANDAU: It looks to be a hundred fifty
13 thousand dollars even. Lawrence A. Moens Associates, Inc.

14 MR. MARIANI: Maybe you can find it.

15 MR. LANDAU: Yeah. I'm getting dizzy
16 looking at this thing. Here it is. I'm going to circle
17 it.

18 MR. MARIANI: No, don't circle it.

19 MR. LANDAU: Don't circle it? Right there.

20 MR. MARIANI: The 150.

21 MR. LANDAU: Yeah.

22 MR. MARIANI: I've pointed it out to the
23 witness.

24 MR. LANDAU: Okay.

25 BY MR. LANDAU:

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1 Q. Ms. Matthews, this report suggests there was
2 a payment made on May 10, 2014, Check Number, it looks
3 like, 1079, to Lawrence A. Moens, Associate -- Associates
4 Inc. for a hundred fifty thousand dollars.

5 Do you know what that payment was for?

6 A. On advice of counsel, I'm exercising my
7 right under the Fifth Amendment and decline to answer the
8 question.

9 Q. And do you know -- are you aware that
10 Lawrence Moens is the current broker for the sale of
11 your -- for your home in your husband's bankruptcy case?

12 MR. SALAZAR: Objection, relevancy.

13 THE WITNESS: On advice of counsel, I am
14 exercising my rights under the Fifth Amendment and decline
15 to answer the question.

16 BY MR. LANDAU:

17 Q. And, in fact, that hundred and fifty
18 thousand dollar payment to Mr. Moens has never been
19 disclosed to the Bankruptcy Court; correct?

20 MR. SALAZAR: Objection to form and
21 relevancy.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 MR. GEORGE: Phil, what was the date of that

26 (Pages 101 to 104)

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1 payment?
2 MR. LANDAU: It looks to be May 12, 2014.
3 MR. GEORGE: Thank you.
4 MR. LANDAU: John, I'd ask you now, can you
5 point her to -- or do you want me to just find it, May 27,
6 2014?
7 MR. MARIANI: You find it?
8 MR. LANDAU: Sure.
9 MR. MARIANI: I don't know which way these
10 run.
11 MR. LANDAU: Let me find it.
12 MR. MARIANI: Say it again, May 27th?
13 MR. LANDAU: May 27, 2014, there's an ACH to
14 Bonaventure, it looks like 23, LLC, for \$1.1 million,
15 right in the center of the page.
16 MR. MARIANI: Right here or there?
17 MR. LANDAU: There.
18 MR. MARIANI: Okay. How much is it?
19 MR. LANDAU: 1.1 million.
20 MR. MARIANI: Okay.
21 BY MR. LANDAU:
22 Q. Ms. Matthews, can you tell us what that
23 payment of \$1.1 million to Bonaventure 23, LLC, what that
24 payment was for?
25 MR. SALAZAR: Objection to form and

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1 relevancy. I believe it's Bonaventure 22, by the way.
2 MR. LANDAU: Is it 22, it could be?
3 THE WITNESS: On advice of counsel, I'm
4 exercising my rights under the Fifth Amendment and decline
5 to answer the question.
6 BY MR. LANDAU:
7 Q. In fact, Ms. Matthews, that's \$1.1 million
8 of diverted funds from the EB-5 investors; isn't that
9 correct?
10 MR. SALAZAR: Same objection, relevancy.
11 THE WITNESS: On the advice of counsel, I'm
12 exercising my rights under the Fifth Amendment and decline
13 to answer the question.
14 MR. LANDAU: John, can you turn to
15 Exhibit H?
16 MR. MARIANI: Is that after the Department
17 of State document?
18 MR. LANDAU: I believe so, yeah.
19 MR. GEORGE: Phil, can we take a break for a
20 few minutes?
21 MR. LANDAU: Absolutely. I can actually use
22 a restroom break.
23 MR. MARIANI: Exhibit H, I have it.
24 (Thereupon, a brief recess was taken, after
25 which the following proceedings were had:)

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1 BY MR. LANDAU:
2 Q. Ms. Matthews, I'd refer your attention to
3 Exhibit H.
4 MR. MARIANI: Is the first word on Exhibit H
5 Alibi, Ltd.?
6 MR. LANDAU: Yes, yes.
7 MR. MARIANI: We have it in front of the
8 witness.
9 BY MR. LANDAU:
10 Q. Ms. Matthews, can you tell us what Alibi,
11 Limited is?
12 A. On advice of counsel, I'm exercising my
13 rights under the Fifth Amendment and decline to answer the
14 question.
15 Q. And Alibi -- Alibi is the entity that you
16 used to purchase a yacht; isn't that correct?
17 MR. SALAZAR: Objection, relevancy.
18 THE WITNESS: On advice of counsel, I'm
19 exercising my rights under the Fifth Amendment and decline
20 to answer the question.
21 BY MR. LANDAU:
22 Q. And if you turn to the next page, it says
23 certificate of incorporation. Do you see that?
24 MR. MARIANI: The page is in front of the
25 witness.

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1 BY MR. LANDAU:
2 Q. That's the document incorporating Alibi,
3 Limited in the Cayman Islands; correct?
4 MR. SALAZAR: Objection, form, relevancy.
5 THE WITNESS: On advice of counsel, I'm
6 exercising my rights under the Fifth Amendment and decline
7 to answer the question.
8 BY MR. LANDAU:
9 Q. And, in fact, you are the sole member of
10 Alibi; isn't that correct?
11 MR. SALAZAR: Objection, relevancy.
12 THE WITNESS: On advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.
15 BY MR. LANDAU:
16 Q. Why would Alibi be in your name?
17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.
20 MR. SALAZAR: Objection, relevancy.
21 BY MR. LANDAU:
22 Q. Isn't it true that Alibi is in your name as
23 a further vehicle to defraud and hinder the EB-5
24 investors?
25 MR. SALAZAR: Same objection.

27 (Pages 105 to 108)

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1 THE WITNESS: On advice of counsel, I'm
2 exercising my rights under the Fifth Amendment and decline
3 to answer the question.

4 MR. LANDAU: John, if you'd flip further
5 through it, I don't know if you want me to flip through
6 it, there's a certificate of formation of Alibi, LLC in
7 Delaware.

8 MR. MARIANI: Does it have a page number on
9 it?

10 MR. LANDAU: It does not. The document
11 right after it is the operating agreement of Alibi, LLC.

12 MR. MARIANI: Meaning the memorandum of
13 association?

14 MR. LANDAU: No, do you want me to ---

15 MR. MARIANI: It's later? Why don't you
16 find it?

17 MR. LANDAU: Yeah, I'll flip through it for
18 you.

19 MR. MARIANI: It would have been nice if we
20 had these marked with Post Its.

21 MR. LANDAU: Yeah. Well, we've been very
22 busy in this case. Here we go. Here it is. Got it.

23 MR. MARIANI: Okay. We have that in front
24 of the witness.

25 MR. SALAZAR: Do you know which exhibit that

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1 MR. LANDAU: John, if we can turn to the
2 next document? It's the operating agreement of Alibi,
3 LLC.

4 MR. MARIANI: We have it in front of the
5 witness.

6 MR. LANDAU: And if you'd turn to Page 3 of
7 that document, it identifies Mia Matthews as the member.
8 Actually, go back. If you go to -- let's start at Page 2,
9 under Article 2. Are you there?

10 MR. MARIANI: It's in front of the witness,
11 yes.

12 MR. SALAZAR: Is this -- what document are
13 we looking at now? I'm sorry, I have not been able to
14 locate it. Is it the Cayman Islands operating agreement?

15 MR. LANDAU: No, the operating -- I think
16 this is the Delaware. It was right after the certificate
17 of formation for Alibi, LLC.

18 MR. MARIANI: Is there a question?

19 MR. LANDAU: Oh, I'm sorry, I thought Lou
20 was asking ---

21 MR. SALAZAR: I'm sorry. I'm still trying
22 to locate it, but please proceed.

23 BY MR. LANDAU:

24 Q. Okay. So Article 2 -- John, are you there?

25 MR. MARIANI: Yes.

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1 is?

2 MR. LANDAU: I want to make sure that the
3 record is clear. I think this is part of Exhibit G or --
4 I think it's H, I just want to make sure that's right.

5 This is part of Exhibit H, and it is a certificate of
6 formation of Alibi, LLC in -- in the state of Delaware.

7 John, are you there?

8 MR. MARIANI: It's in front of the witness,
9 yes.

10 BY MR. LANDAU:

11 Q. Ms. Matthews, have you seen this document
12 before?

13 A. On advice of counsel, I'm exercising my
14 rights under the Fifth Amendment and decline to answer the
15 question.

16 Q. What is this document?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. In fact, this document is a -- the
21 certificate of formation for Alibi, LLC, naming you as the
22 sole member; is that correct?

23 A. On advice of counsel, I'm exercising my
24 rights under the Fifth Amendment and decline to answer the
25 question.

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1 BY MR. LANDAU:

2 Q. Article 2 identifies -- it says, the initial
3 members shall be Mia S. Matthews. Do you see that?

4 MR. MARIANI: Under Article 2?

5 MR. LANDAU: Yes.

6 MR. MARIANI: How far down under Article 2?

7 MR. LANDAU: The second sentence.

8 MR. MARIANI: The second sentence?

9 MR. LANDAU: Yeah.

10 MR. MARIANI: Okay. Yes, we have that in
11 front of the witness.

12 BY MR. LANDAU:

13 Q. Ms. Matthews, this is correct that you are
14 the sole member of -- this document identifies you as the
15 sole member of Alibi, LLC; correct?

16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.

19 Q. And if you flip a few pages more, there's an
20 Exhibit A with a passport.

21 MR. MARIANI: After the share certificate?

22 MR. LANDAU: If you keep on -- that's weird,
23 it was right after -- maybe you're going in the wrong -- I
24 think maybe you're going in the wrong direction.

25 MR. MARIANI: Let's see. Yeah, maybe I am.

28 (Pages 109 to 112)

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1 MR. LANDAU: Yeah, keep on going. Flip it
2 around, I think. There you go. Okay. Now, the document,
3 the way you're holding it, above it or right before it, do
4 you see where it says Exhibit A?

5 MR. MARIANI: Well, I see ---

6 MR. LANDAU: Photographic -- I'm going to
7 refer to both of them. They go together.

8 MR. MARIANI: The typed Exhibit A,
9 photographic identification?

10 MR. LANDAU: Correct.

11 MR. MARIANI: Yes, we have that page.

12 BY MR. LANDAU:

13 Q. Ms. Matthews, have you seen this document
14 before?

15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.

18 Q. And the identification provided, and it
19 looks like it's handwritten Exhibit A, is on a copy of
20 your passport; correct?

21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 MR. LANDAU: John, if you can flip a few
25 more pages, there's a brochure with Mia's picture on it.

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1 you tell us what this document is?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer the
4 question.

5 Q. And I'm referring to the page, and
6 unfortunately they're not numbered, but there's the
7 picture, there's the page that has a picture of you, and
8 then the following page it says, Mia S. Matthews,
9 principal.

10 John, are we there?

11 MR. MARIANI: I have that page.

12 MR. LANDAU: And, again, this is part of
13 Exhibit H.

14 BY MR. LANDAU:

15 Q. And Ms. Matthews, this was marketing
16 material that was presented to the EB-5 investors; isn't
17 that correct?

18 A. On advice of counsel, I'm exercising my
19 rights under the Fifth Amendment and decline to answer the
20 question.

21 Q. And it identifies you as a principal of the
22 Palm House Hotel; isn't that correct?

23 MR. SALAZAR: Objection to form and
24 relevancy.

25 THE WITNESS: On advice of counsel, I'm

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1 Yep, and it has her name. Are you there?

2 MR. MARIANI: Well, I see this page.

3 MR. LANDAU: Yes, okay, and above it --
4 yeah, it looks to be a picture.

5 BY MR. LANDAU:

6 Q. Ms. Matthews, this is a further part of
7 Exhibit H, and it looks to be a picture of you, and on top
8 of it, it says Palm House, Palm Beach. Do you see that?

9 A. On advice of counsel, I am exercising my
10 rights under the Fifth Amendment and decline to answer the
11 question.

12 Q. You're not going to identify your
13 photograph?

14 A. On the advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.

17 Q. So that's not your picture? The picture --
18 the page that your attorney is holding in front of you,
19 that -- that is, in fact, your picture; correct?

20 A. On the advice of counsel, I'm exercising my
21 rights under the Fifth Amendment and decline to answer the
22 question.

23 MR. SALAZAR: Objection, relevancy. Sorry.

24 BY MR. LANDAU:

25 Q. Ms. Matthews, what is this document? Can

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1 exercising my rights under the Fifth Amendment and decline
2 to answer the question.

3 BY MR. LANDAU:

4 Q. And, in fact, you were never a principal of
5 the Palm House Hotel; isn't that correct?

6 A. On advice of counsel, I'm exercising my
7 rights under the Fifth Amendment and decline to answer the
8 question.

9 Q. This is a further lie that was presented to
10 the EB-5 investors; isn't that true?

11 A. On advice of counsel, I'm exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 Q. Ms. Matthews, can you explain why this
15 document purports to be marketing material with your name
16 as principal on it?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 MR. LANDAU: John, if you can flip like two
21 more pages forward. You'll see there are -- there's a
22 letter from Hospitality Investors Group. Are you there?

23 MR. MARIANI: Yes.

24 MR. LANDAU: At the top it says, Exhibit B,
25 professional reference.

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1 MR. MARIANI: Yes.
 2 BY MR. LANDAU:
 3 Q. Ms. Matthews, can you tell us what this
 4 document is?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 Q. For what purpose would Frank Orenstein of
 9 Hospitality Investors Group be providing a reference on
 10 your behalf?
 11 MR. SALAZAR: Objection, relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 MR. LANDAU: Can we turn to the next page,
 16 and that page is another reference letter from Regions
 17 Bank?
 18 John, do you have it?
 19 MR. MARIANI: There's a Regions Exhibit C,
 20 financial reference.
 21 MR. LANDAU: Yes, that's it.
 22 BY MR. LANDAU:
 23 Q. Ms. Matthews, have you seen this document
 24 before?
 25 A. On the advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
 2 question.
 3 Q. And can you explain for what purpose a
 4 reference letter was being provided on your behalf from
 5 Regions Bank?
 6 A. On advice of counsel, I'm exercising my
 7 rights under the Fifth Amendment and decline to answer the
 8 question.
 9 MR. LANDAU: And, John, a few more pages
 10 forward, it's the last exhibit -- last page of Exhibit H,
 11 right before it says Exhibit I.
 12 MR. MARIANI: What's it look like?
 13 MR. LANDAU: (Indicating.)
 14 MR. SALAZAR: May I see?
 15 MR. LANDAU: (Indicating.)
 16 MR. MARIANI: Okay. I have the last page.
 17 The heading is Regions authorization of corporation?
 18 MR. LANDAU: Correct.
 19 MR. MARIANI: Those are the first three
 20 words of the description.
 21 MR. LANDAU: Yeah, the full title is
 22 authorization of corporation, partnership, association or
 23 other entity to utilize deposit or fee-based services.
 24 MR. MARIANI: That page is in front of the
 25 witness.

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1 BY MR. LANDAU:
 2 Q. Ms. Matthews, can you tell us what this
 3 document is?
 4 A. On advice of counsel, I'm exercising my
 5 rights under the Fifth Amendment and decline to answer the
 6 question.
 7 Q. In fact, it's a document to open an account
 8 at Regions Bank; isn't that correct?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. And if you look further down towards the
 13 middle of it, it identifies you as the director of
 14 Alibi, Ltd.; correct?
 15 A. On advice of counsel, I'm exercising my
 16 rights under the Fifth Amendment and decline to answer the
 17 question.
 18 Q. And it further identifies authorized signers
 19 of Jennifer Hue (phonetic) and Edward Snowden; isn't that
 20 correct?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 MR. SALAZAR: Objection to relevancy.
 25 BY MR. LANDAU:

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1 Q. Jennifer Hue is or was Bob Matthews'
 2 assistant; correct?
 3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.
 6 Q. And Edward Snowden was the captain of the
 7 yacht; correct?
 8 A. On advice of counsel, I'm exercising my
 9 rights under the Fifth Amendment and decline to answer the
 10 question.
 11 MR. LANDAU: John, can you turn to the next
 12 page? Top of it says account package. I think you went
 13 the wrong way again.
 14 MR. MARIANI: Oh. I don't think so.
 15 Exhibit I?
 16 MR. LANDAU: Part of Exhibit I.
 17 MR. MARIANI: Okay. The first page ---
 18 MR. LANDAU: Oh, it is -- yes, yes,
 19 Exhibit I.
 20 MR. MARIANI: So it is the first page of
 21 Exhibit I?
 22 MR. LANDAU: Yes, and the title is account
 23 package, non-personal checking/savings services.
 24 MR. MARIANI: That page is in front of the
 25 witness.

30 (Pages 117 to 120)

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1 BY MR. LANDAU:
 2 Q. Okay, and Ms. Matthews, have you seen this
 3 document before?
 4 A. On advice of counsel, I'm exercising my
 5 rights under the Fifth Amendment and decline to answer the
 6 question.
 7 Q. In fact, it's another account opening
 8 document from Regions Bank, isn't it?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. And it's through the -- through this
 13 document you were opening an account for Alibi Ltd.;
 14 correct?
 15 MR. SALAZAR: Objection to relevancy again.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. At the bottom, that's your signature,
 21 correct, where it says Maria Matthews, director?
 22 MR. SALAZAR: Objection, relevancy.
 23 THE WITNESS: On advice of counsel, I am
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 MR. LANDAU: And here is the relevancy, Lou.
 2 BY MR. LANDAU:
 3 Q. Ms. Matthews, why don't you read to us what
 4 the address is?
 5 MR. MARIANI: Objection, form. The document
 6 speaks -- I'm going to direct the witness not to read from
 7 the document.
 8 MR. LANDAU: Okay.
 9 BY MR. LANDAU:
 10 Q. Isn't it true that the address says
 11 160 Royal Palm Way, Palm Beach, Florida?
 12 MR. SALAZAR: Objection, relevancy.
 13 THE WITNESS: On advice of counsel, I'm
 14 exercising my rights under the Fifth Amendment and decline
 15 to answer the question.
 16 BY MR. LANDAU:
 17 Q. Why would you be opening another company at
 18 160 Royal Palm Way, Palm Beach?
 19 MR. SALAZAR: Objection, relevancy.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Isn't it true you're opening this company as
 25 a vehicle to defraud EB-5 investors?

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1 MR. SALAZAR: Objection, relevancy.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. LANDAU:
 6 Q. Any of the monies that flowed through Alibi,
 7 Ltd., did you pay income taxes on those monies?
 8 MR. SALAZAR: Objection, relevancy.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. On any of the monies that flowed through
 14 Alibi, Ltd., did creditors of 160 Royal Palm, LLC get any
 15 benefit from those funds?
 16 MR. SALAZAR: Objection to form and
 17 relevancy.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. Isn't it true that creditors received no
 23 benefit from funds deposited in this Regions Alibi, Ltd.
 24 account?
 25 MR. SALAZAR: Objection to form and

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1 relevancy.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 MR. LANDAU: John, can you turn to Exhibit
 6 N, as in Nancy?
 7 MR. MARIANI: Is that near the back of the
 8 document?
 9 MR. LANDAU: It is, yes.
 10 MR. GEORGE: And what is it, Phil?
 11 MR. MARIANI: About how many pages? Yeah,
 12 what is it?
 13 MR. LANDAU: There are like three -- it is
 14 like the fourth to the last page.
 15 MR. MARIANI: I didn't want to do this, but
 16 I'm going to do it.
 17 MR. SALAZAR: Don't touch those documents.
 18 MR. LANDAU: Yeah, I dropped them earlier.
 19 MR. SALAZAR: We won't know what the heck is
 20 happening.
 21 MR. MARIANI: Exhibit N.
 22 MR. LANDAU: Yes. I think it's the next --
 23 yeah, there you go. All right, and this is a letter from
 24 Weiss Handler, yes?
 25 MR. MARIANI: The document is in front of

31 (Pages 121 to 124)

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1 the witness.
 2 BY MR. LANDAU:
 3 Q. Okay, and the document that's in front of
 4 the witness is a letter from the Law Firm of Weiss Handler
 5 & Cornwell to Robert and Mia Matthews, and specifically it
 6 shows that it was e-mailed to Mia Matthews at me.com.
 7 Do you see that, Ms. Matthews?
 8 MR. MARIANI: That's in front of the
 9 witness.
 10 MR. LANDAU: Okay.
 11 MR. MARIANI: Do you have a question about
 12 the document?
 13 MR. LANDAU: Yes.
 14 BY MR. LANDAU:
 15 Q. Ms. Matthews, have you seen this document
 16 before?
 17 A. On advice of counsel, I'm exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 Q. And, in fact, isn't it correct that this
 21 letter is making demand on you for over \$16 million that
 22 was diverted from the Palm House Hotel project?
 23 A. On advice of counsel, I'm exercising my
 24 rights under the Fifth Amendment and decline to answer the
 25 question.

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1 Q. Is any of -- anything stated in this letter
 2 not true?
 3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.
 6 Q. In fact, everything in this letter is true;
 7 is that correct?
 8 A. On advice of counsel, I'm exercising my
 9 rights under the Fifth Amendment and decline to answer the
 10 question.
 11 MR. LANDAU: What are we up to?
 12 THE COURT REPORTER: 11.
 13 MR. LANDAU: This will be 11?
 14 THE COURT REPORTER: Yes.
 15 MR. LANDAU: Okay. Go ahead and mark this
 16 as 11.
 17 (Thereupon, Exhibit Number 11 was marked for
 18 Identification.)
 19 MR. SALAZAR: Two of them?
 20 MR. LANDAU: Yep.
 21 MR. SALAZAR: I'm sorry, this is going to be
 22 11?
 23 MR. LANDAU: 11, yes.
 24 MR. MARIANI: Can you represent what this
 25 document is?

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1 BY MR. LANDAU:
 2 Q. So, Ms. Matthews, this document that we've
 3 identified as Exhibit 11, is a checking account register
 4 for Palm House Hotel, LLLP.
 5 MR. MARIANI: May I ask what the case number
 6 refers to on Page 1 and Page 2?
 7 MR. LANDAU: This is the bankruptcy case of
 8 160 Royal Palm, LLC.
 9 MR. MARIANI: Thank you. Is this part of a
 10 larger document in that case?
 11 MR. LANDAU: It is, it is an exhibit --
 12 MR. MARIANI: To what?
 13 MR. LANDAU: -- to either our motion to
 14 limit credit bid or a notice of a filing related to that
 15 motion.
 16 MR. MARIANI: Okay. Just one last question.
 17 Can you tell me what Document 163 is?
 18 MR. LANDAU: That's what I'm saying, it's
 19 either -- do you ---
 20 MR. GEORGE: This is, I believe, KK-PB's
 21 response in opposition to the motion for credit bid.
 22 MR. LANDAU: Oh, this is -- okay.
 23 MR. SALAZAR: No.
 24 MR. LANDAU: No?
 25 MR. SALAZAR: I wouldn't have attached this,

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1 I don't think so. I wouldn't have had this.
 2 MR. MARIANI: Well, can someone put on the
 3 record what Document 163 is in the bankruptcy case,
 4 because you're representing this is Exhibit 3 to document
 5 163.
 6 MR. LANDAU: Correct.
 7 MR. SALAZAR: Let me help you.
 8 MR. GEORGE: Phil, you want me to go ask
 9 Eric?
 10 MR. LANDAU: Go ask Eric or Elena.
 11 MR. MARIANI: If you have the docket.
 12 MR. LANDAU: They'll know, they'll know.
 13 Hold on for a second, it may be right here. It is either
 14 an exhibit to our motion to limit credit bid or our
 15 response to -- an exhibit to our response to KK-PB's
 16 motion to estimate claim, or it's a notice of filing
 17 related to those documents.
 18 David will find out for sure in a second,
 19 but those are all the operative matters that are before
 20 the Court in this matter.
 21 MR. SALAZAR: So no New Haven tomorrow?
 22 Should I assume it's not going to go forward, because I
 23 want to call some people?
 24 MR. LANDAU: Yeah, I don't think so.
 25 MR. SALAZAR: I thought -- no, I thought for

32 (Pages 125 to 128)

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1 certain he was coming.
 2 THE COURT REPORTER: Are we on the record?
 3 MR. SALAZAR: No, sorry.
 4 MR. LANDAU: Sorry, yeah.
 5 (Off the record.)
 6 MR. MARIANI: Counsel that is questioning
 7 you has represented that this document is part of a filing
 8 that he made in the bankruptcy proceeding for 160.
 9 MR. LANDAU: Correct, it's ECF Number 163,
 10 and this would be Exhibit Number 3 to that filing.
 11 MR. MARIANI: And you're going to identify
 12 what that was a little bit later?
 13 MR. LANDAU: Correct, yes.
 14 MR. MARIANI: So go ahead and ask your
 15 questions.
 16 BY MR. LANDAU:
 17 Q. Ms. Matthews, have you -- have you seen this
 18 document before?
 19 A. On advice of counsel, I'm exercising my
 20 rights under the Fifth Amendment and decline to answer the
 21 question.
 22 Q. In fact, this document represents a check
 23 register for Palm House Hotel, LLLP; correct?
 24 A. On advice of counsel, I'm exercising my
 25 rights under the Fifth Amendment and decline to answer the

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1 question.
 2 Q. And, Ms. Matthews, you have personal
 3 knowledge as to each of the transfers listed in this
 4 exhibit; correct?
 5 MR. SALAZAR: Object to form.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. And each of the transfers identified in this
 11 exhibit are true and correct, and actually happened; yes?
 12 MR. SALAZAR: Objection to form and
 13 relevancy.
 14 THE WITNESS: On advice of counsel, I'm
 15 expressing -- exercising my rights under the Fifth
 16 Amendment and decline to answer the question.
 17 MR. LANDAU: Now we'll mark this as 12.
 18 (Thereupon, Exhibit Number 12 was marked for
 19 Identification.)
 20 MR. MARIANI: Again, counsel, this is a
 21 document you filed as an exhibit?
 22 MR. LANDAU: Correct. This is Exhibit 5 to
 23 the filing at ECF Number 163 in the bankruptcy case of
 24 160 Royal Palm, LLC.
 25 MR. MARIANI: Is this a document you

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1 prepared?
 2 MR. LANDAU: I prepared the exhibit. The
 3 actual documents were received in discovery.
 4 MR. MARIANI: Go ahead, please.
 5 BY MR. LANDAU:
 6 Q. Ms. Matthews, the document that we've marked
 7 for identification purposes as Exhibit Number 12, have you
 8 seen this document before?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. All right, and, in fact, these are monies
 13 that were transferred from Palm House Hotel, LLLP to the
 14 Craig Galle law firm trust account; isn't that correct?
 15 MR. SALAZAR: Object on form.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. And, Ms. Matthews, you had, at the time
 21 these transactions were recorded, personal knowledge of
 22 each of the transactions; isn't that correct?
 23 MR. SALAZAR: Same objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 MR. GEORGE: Excuse me. Document 163 is the
 3 opposition and response to the motion to estimate claim
 4 for purchase of credit bidding filed by Creditor KK-PB
 5 Financial, LLC, which was filed by the debtor, 160 Royal
 6 Palm, LLC, and it was filed on October 17, 2018.
 7 MR. LANDAU: So just to be clear, that was
 8 the debtor's response to KK-PB's motion to estimate claim.
 9 MR. MARIANI: And you're the debtor?
 10 MR. LANDAU: Correct, I represent the
 11 debtor.
 12 MR. MARIANI: Continue with your
 13 questioning.
 14 Thank you, David.
 15 MR. GEORGE: You're welcome.
 16 BY MR. LANDAU:
 17 Q. Ms. Matthews, does this exhibit represent
 18 funds that were diverted from the Palm House Hotel
 19 project?
 20 MR. SALAZAR: Objection, form.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. In fact, isn't it true that this document

33 (Pages 129 to 132)

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1 represents funds that were diverted from the Palm House
 2 Hotel project?
 3 MR. SALAZAR: Objection, form.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, do you know if at the time
 9 these transfers were made, was the debtor, 160 Royal Palm,
 10 LLC -- LLC insolvent?
 11 MR. SALAZAR: Just a moment.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 MR. SALAZAR: Never mind.
 16 BY MR. LANDAU:
 17 Q. At the time each of these transactions were
 18 made, isn't it true that the debtor, 160 Royal Palm, LLC,
 19 was, in fact, insolvent?
 20 MR. SALAZAR: Objection to form.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. Isn't it true that as a result of each of

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1 these transfers being made, they rendered the debtor,
 2 160 Royal Palm, LLC, insolvent?
 3 MR. SALAZAR: Objection to form.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, if you look towards the middle
 9 of this document, it refers to transfers, it says Evans
 10 IOLTA.
 11 MR. MARIANI: Which page are you on in the
 12 document?
 13 MR. LANDAU: So up top it says Page 2 of 5.
 14 MR. MARIANI: And you're looking at the
 15 middle?
 16 MR. LANDAU: Yes.
 17 MR. MARIANI: April 15, 2013, is that the
 18 middle?
 19 MR. LANDAU: Correct, correct.
 20 MR. MARIANI: So your question again?
 21 BY MR. LANDAU:
 22 Q. So my question is: Each of those transfers
 23 involving the Evans IOLTA account, can you identify what
 24 those transfers were for?
 25 A. On advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
 2 question.
 3 Q. Where it says Evans IOLTA, Evans refers to
 4 Les Evans; correct?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 Q. And Les Evans, at the time, was counsel for
 9 the debtor, 160 Royal Palm, LLC; isn't that correct?
 10 MR. SALAZAR: Objection to form.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Those three transfers regarding Evans IOLTA,
 16 can you tell us what those transfers were for?
 17 A. On advice of counsel, I'm exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 Q. And, in fact, isn't it accurate, that those
 21 transfers were diverted EB-5 investor funds?
 22 MR. SALAZAR: Object on relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. And at the time of those transfers, you were
 3 consulting with Glenn Straub; isn't that correct?
 4 MR. SALAZAR: Object to form --
 5 THE WITNESS: On advice ---
 6 MR. SALAZAR: -- relevancy.
 7 THE WITNESS: Pardon me. On advice of
 8 counsel, I'm exercising my rights under the Fifth
 9 Amendment and decline to answer the question.
 10 BY MR. LANDAU:
 11 Q. And Glenn Straub had specific knowledge as
 12 to your involvement with the Palm House Hotel at that
 13 time; isn't that correct?
 14 MR. SALAZAR: Objection, form.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. If you go to the last entry, it says Evans
 20 IOLTA, and it shows a decrease of roughly \$9.2 million.
 21 Do you see that?
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 Q. Ms. Matthews, can you explain where those

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1 \$9.2 million went?
 2 A. On advice of counsel, I'm exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.
 5 Q. Isn't it true that those funds, those
 6 \$9.2 million, represent diverted EB-5 monies?
 7 MR. SALAZAR: Objection to form.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. Isn't it true that those \$9.2 million,
 13 160 Royal Palm received no benefit from those funds?
 14 MR. SALAZAR: Object to form.
 15 THE WITNESS: On the advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. Isn't it correct that those funds were used
 20 for purposes other than the business purposes of 160 Royal
 21 Palm, LLC?
 22 MR. SALAZAR: Objection to form.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. And isn't it correct that you did not pay
 3 federal income taxes on any of those \$9.2 million?
 4 MR. SALAZAR: Objection, form and relevancy.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 MR. LANDAU: John, let's flip to the next
 9 document.
 10 MR. SALAZAR: Page number?
 11 MR. LANDAU: Page 3 of 5, and 4 of 5, and 5
 12 of 5, the last three pages.
 13 MR. SALAZAR: I'm sorry, 3 of 5 is where
 14 we're at right now?
 15 MR. LANDAU: Yes.
 16 MR. MARIANI: That page is in front of the
 17 witness.
 18 MR. LANDAU: Okay.
 19 BY MR. LANDAU:
 20 Q. Ms. Matthews, can you tell us what this
 21 document is?
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 Q. And, in fact, isn't it correct that this

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1 document represents an accounting of the trust account of,
 2 it says Matthews PO Palm House, that was being held by
 3 Les Evans?
 4 MR. SALAZAR: Objection, form.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. And just so we're crystal clear, the
 10 document that we have in front of us is Exhibit 5 to
 11 Docket Entry 163 in the 160 Royal Palm bankruptcy case?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 Q. Ms. Matthews, I'd ask you to turn to the
 16 last page of this exhibit, 5 of 5.
 17 MR. MARIANI: The page is in front of the
 18 witness.
 19 BY MR. LANDAU:
 20 Q. Can you explain to us the first transfer,
 21 \$266,064.60, to the Tax Collector of Palm Beach County?
 22 MR. SALAZAR: Objection, relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. Isn't it true that that was a payment of
 3 property taxes on your personal residence?
 4 MR. SALAZAR: Same objection.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. And then below that, Ms. Matthews, there are
 10 three payments, it looks like wires, to Dovenmuehle,
 11 D-o-v-e-n-m-u-e-h-l-e, Dovenmuehle Mortgage, Inc.
 12 Do you see those?
 13 A. On advice of counsel, I'm exercising my
 14 rights under the Fifth Amendment and decline to answer the
 15 question.
 16 Q. Well, you see them, yes? Those are in front
 17 of you?
 18 MR. MARIANI: That page is before the
 19 witness.
 20 MR. LANDAU: Okay.
 21 BY MR. LANDAU:
 22 Q. And can you explain why those payments are
 23 being made to Dovenmuehle Mortgage, Inc.?
 24 A. On advice of counsel, I'm exercising my
 25 rights under the Fifth Amendment and decline to answer the

35 (Pages 137 to 140)

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1 question.
 2 Q. In fact, those are further funds being
 3 diverted from the EB-5 investors and being diverted from
 4 160 Royal Palm, LLC; isn't that correct?
 5 MR. SALAZAR: Object to form.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. And the same question with the \$92,700
 11 payment to Deutsche Bank on March 4, 2014.
 12 MR. MARIANI: What is the question?
 13 BY MR. LANDAU:
 14 Q. What do those funds represent?
 15 A. On advice of counsel, I'm exercising my
 16 rights under the Fifth Amendment and decline to answer the
 17 question.
 18 Q. In fact, isn't it a payment on the mortgage
 19 of your personal home?
 20 A. On advice of counsel, I'm exercising my
 21 rights under the Fifth Amendment and decline to answer the
 22 question.
 23 Q. So you're refusing to answer a question
 24 regarding the finances of 160 Royal Palm, LLC; isn't that
 25 correct?

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1 MR. SALAZAR: Objection to form.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 MR. LANDAU: What are we up to?
 6 THE COURT REPORTER: 13.
 7 MR. LANDAU: This will be 13?
 8 THE COURT REPORTER: Yes.
 9 MR. LANDAU: So we'll make this
 10 Composite 13.
 11 (Thereupon, Composite Exhibit Number 13 was
 12 marked for Identification.)
 13 MR. LANDAU: I want to make sure, Lou,
 14 you've got the whole thing here.
 15 MR. SALAZAR: All right. This is 13; right?
 16 I'm going to give this one to David.
 17 MR. MARIANI: Can you identify the Bates
 18 stamp numbers for Exhibit 13, please?
 19 MR. LANDAU: Sure. Exhibit 13 are Bates
 20 Stamp Numbers 523 through -- it looks like there's a page
 21 missing.
 22 Do you guys have 526 there?
 23 MR. SALAZAR: No.
 24 MR. MARIANI: No.
 25 MR. LANDAU: Okay. So they're Bates -- the

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1 documents that are in front of Ms. Matthews are Bates
 2 Numbered 523, 524, 525, 527 and 528, 526 is missing.
 3 MR. MARIANI: So are you going to leave the
 4 exhibit like that?
 5 MR. LANDAU: Sure.
 6 MR. MARIANI: Okay, and can you make a
 7 representation of whose Bates numbers those are?
 8 MR. LANDAU: These, I believe, are documents
 9 that were produced by Mr. Galle.
 10 MR. MARIANI: Can we make sure the record
 11 shows there's no 526 in this exhibit, so later on
 12 nobody --
 13 MR. LANDAU: Sure.
 14 MR. MARIANI: -- looks for it?
 15 MR. LANDAU: Yep.
 16 BY MR. LANDAU:
 17 Q. Ms. Matthews, the document that has been
 18 identified as Exhibit Number 13, have you seen this
 19 document before?
 20 A. On advice of counsel, I'm exercising my
 21 rights under the Fifth Amendment and decline to answer the
 22 question.
 23 Q. And, in fact, this document -- in this
 24 document, your husband, Bob Matthews, is asking
 25 Craig Galle to prepare a legal document with regard to the

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1 foreclosure auction of the home in -- at 115 Lower Church
 2 Hill in Connecticut; isn't that correct?
 3 MR. SALAZAR: Object to form and relevancy.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. And, in fact, Mr. Galle is preparing a
 9 document to further the, what I'll refer to as strawman,
 10 foreclosure in Connecticut --
 11 MR. SALAZAR: Objection to form.
 12 BY MR. LANDAU:
 13 Q. -- isn't that correct?
 14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 Q. And, in fact -- well, let me ask you a
 18 question, Ms. Matthews.
 19 To your knowledge, how is what Mr. Galle is
 20 doing here through this document, any different than what
 21 Mr. Evans did for Mr. Matthews, which he was indicted for?
 22 MR. SALAZAR: Objection to form.
 23 BY MR. LANDAU:
 24 Q. Do you know?
 25 MR. SALAZAR: Objection to form.

36 (Pages 141 to 144)

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. In fact, isn't it true that what's being
 6 done here by Mr. Galle, is exactly the same activity and
 7 actions as Mr. Evans took to further the fake or friendly
 8 foreclosure that took place in Connecticut?
 9 MR. SALAZAR: Objection to form.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. To your knowledge, has Mr. Galle been
 15 indicted yet?
 16 MR. SALAZAR: Objection to form.
 17 THE WITNESS: On the advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. Have you spoken to Mr. Galle about this
 22 document?
 23 A. On advice of counsel, I'm exercising my
 24 rights under the Fifth Amendment and decline to answer the
 25 question.

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1 Q. To your knowledge, was Mr. Straub involved
 2 in the friendly foreclosure of 115 Lower Church Hill in
 3 Connecticut?
 4 MR. SALAZAR: Objection to form.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and
 7 decline -- decline to answer the question.
 8 BY MR. LANDAU:
 9 Q. In fact, isn't it true that Mr. Straub was
 10 involved in the transaction referenced in this exhibit,
 11 Exhibit Number 13?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 MR. SALAZAR: Objection, relevancy.
 16 MR. LANDAU: We're up to 14. Call this
 17 Composite 14.
 18 (Thereupon, Composite Exhibit Number 14 was
 19 marked for Identification.)
 20 MR. MARIANI: Okay. For the record, can we
 21 identify Exhibit 14 by Bates stamp number, please?
 22 MR. LANDAU: Well, it's Bates stamped twice
 23 it looks like, but in the way it was produced to us, the
 24 Bates stamps that were on it were the ones -- the larger
 25 ones at the top that begin at MM00001, and go all the way

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1 through MM00105.
 2 MR. SALAZAR: Counsel, just for the record,
 3 we have not received a copy of this. If you'd provide
 4 that right away, we'd appreciate it.
 5 MR. LANDAU: These absolutely were provided.
 6 These are -- these are documents that were produced by
 7 Ms. Matthews.
 8 MR. SALAZAR: I know, but I don't think we
 9 got a copy.
 10 MR. LANDAU: It's in the Dropbox.
 11 MR. SALAZAR: Which Dropbox?
 12 MR. LANDAU: However they were ---
 13 MR. SALAZAR: We got some earlier ones but
 14 not this one -- maybe.
 15 BY MR. LANDAU:
 16 Q. Ms. Matthews, can you please identify the
 17 document that's been marked exhibit -- Composite
 18 Exhibit 14?
 19 MR. MARIANI: We'll stipulate these are the
 20 documents that my office produced pursuant to your
 21 subpoena.
 22 MR. LANDAU: Okay.
 23 BY MR. LANDAU:
 24 Q. And, Ms. Matthews, these are, in fact, text
 25 messages between yourself and Glenn Straub; is that

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1 correct?
 2 MR. MARIANI: We'll stipulate to that, as
 3 well.
 4 MR. LANDAU: Okay.
 5 BY MR. LANDAU:
 6 Q. Ms. Matthews, tell us about your
 7 relationship with Mr. Straub.
 8 A. On advice ---
 9 MR. SALAZAR: Objection, relevancy.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. Well, why is that -- why is there a
 15 privilege concern with your conversations with Mr. Straub?
 16 A. On the advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 Q. Isn't it true that your concern is your
 20 conversations and your dealings with Mr. Straub furthered
 21 the EB-5 fraud?
 22 MR. SALAZAR: If that's a question, I object
 23 to the form.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

37 (Pages 145 to 148)

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. I'm going to walk you through, Ms. Matthews,
 4 the highlighted sections of this document.
 5 I would refer you to the text, and all of
 6 the highlights are in yellow, March 15, 2018, you say,
 7 I'll come work for you to pay off whatever.
 8 MR. SALAZAR: Objection to form.
 9 BY MR. LANDAU:
 10 Q. What are you referring to there?
 11 MR. SALAZAR: Objection to form.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. What kind of work did you do for Mr. Straub?
 17 A. On advice of counsel, I'm exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 Q. In fact, isn't it true that you never worked
 21 for Mr. Straub?
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 MR. SALAZAR: Objection on relevancy.

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1 BY MR. LANDAU:
 2 Q. Further down, March 15, 2018, 7:51 p.m.,
 3 you're going to have dinner with Mr. Straub; isn't that
 4 correct?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 Q. Flip to the next page, May 3, 2018,
 9 10:44 a.m. Again, you say, I'm ready to get to work when
 10 I get back. What does that mean?
 11 A. On advice of counsel, I am exercising my
 12 rights under the Fifth Amendment and decline to answer the
 13 question.
 14 MR. SALAZAR: Objection, relevancy.
 15 BY MR. LANDAU:
 16 Q. What kind of work were you doing or seeking
 17 to do for Mr. Straub?
 18 A. On advice of counsel, I'm exercising my
 19 rights under the Fifth Amendment and decline to answer the
 20 question.
 21 Q. Ms. Matthews, I want to cut to the chase
 22 here. Isn't it accurate that you were having an affair
 23 with Mr. Straub?
 24 MR. SALAZAR: Objection to form and
 25 relevancy.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 MR. LANDAU: John, I don't know what grounds
 5 she can assert the Fifth on these questions.
 6 MR. MARIANI: We're comfortable with the
 7 assertion. Thank you.
 8 BY MR. LANDAU:
 9 Q. Flip to May 5, 2018, it looks like 7:43 a.m.
 10 My sister lent me money to hire someone in Connecticut,
 11 but he got in a car accident. Also, apparently he has a
 12 conflict and won't be able to represent me. Hopefully I
 13 can get the money back from him to hire someone else, not
 14 sure who.
 15 Are you asking Mr. Straub there to lend you
 16 money?
 17 A. On advice of counsel, I am exercising my
 18 rights under the Fifth Amendment and decline to answer the
 19 question.
 20 Q. In fact, isn't it true that you're asking
 21 him for money for defense counsel in the criminal action
 22 in Connecticut?
 23 MR. SALAZAR: Objection, relevancy.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. He did, in fact, lend you money to hire
 4 counsel, did he not?
 5 MR. SALAZAR: Objection, relevancy, form.
 6 THE WITNESS: On advice of counsel, I'm
 7 exercising my rights under the Fifth Amendment and decline
 8 to answer the question.
 9 BY MR. LANDAU:
 10 Q. In fact, he filed a lawsuit against the
 11 attorney that you hired in -- in Connecticut; isn't that
 12 correct?
 13 MR. SALAZAR: Objection to form.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. May 5, 2018, 7:59 a.m., text from
 19 Glenn Straub. Do you want to read that to us?
 20 MR. MARIANI: The document speaks for
 21 itself.
 22 BY MR. LANDAU:
 23 Q. Well, I'll go ahead and read it.
 24 Come on, any person that can raise kids can
 25 handle whatever hand that was dealt them. They won't be

38 (Pages 149 to 152)

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1 a -- this won't be a walk in the park, but listen to two
 2 different lawyers sounds crazy, but you have government
 3 money, and people that want to make a name for themselves,
 4 and so far you're -- you're -- and so far you're
 5 convictable from what I can see. Just don't come back and
 6 listen to one-sided answers. You have to show the
 7 government that you have no push -- that you are no
 8 pushover, hard earned, smarter than nails. Prepare only
 9 time against a lifetime of a record and people talking
 10 behind your back. One other thing, a publication person
 11 must be hired. Battles are won when the other side sees
 12 it's going to be hard.

13 What was your understanding of the advice
 14 Mr. Straub was giving you there?

15 A. On ---

16 MR. SALAZAR: Objection, sorry, form and
 17 relevancy.

18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.

21 BY MR. LANDAU:

22 Q. In fact, he's actively participating in
 23 giving you advice with regard to your criminal action in
 24 Connecticut?

25 MR. SALAZAR: Objection to form and

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1 relevancy.

2 BY MR. LANDAU:

3 Q. Correct?

4 A. On advice of counsel, I'm exercising my
 5 rights under the Fifth Amendment and decline to answer the
 6 question.

7 Q. And just so we're clear, you were indicted
 8 in Connecticut; correct?

9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.

12 Q. How are you paying for your attorneys in
 13 that action?

14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.

17 Q. Mr. Straub continues to help pay for those
 18 attorneys, does he not?

19 MR. SALAZAR: Objection, form, relevance --
 20 and relevancy.

21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.

24 BY MR. LANDAU:

25 Q. What else does Mr. Straub currently pay for

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1 for you?

2 MR. SALAZAR: Same objection.

3 THE WITNESS: On advice of counsel, I'm
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.

6 BY MR. LANDAU:

7 Q. The monies that Mr. Straub lends to you, are
 8 they disclosed in your husband's bankruptcy D.I.P.
 9 reports?

10 MR. SALAZAR: Same objection.

11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.

14 BY MR. LANDAU:

15 Q. In fact, the monies that are loaned to you
 16 or provided to you by Mr. Straub, they are not reflected
 17 on your husband's debtor-in-possession reports in his
 18 bankruptcy; isn't that correct?

19 MR. SALAZAR: Same objection.

20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.

23 BY MR. LANDAU:

24 Q. Refer your attention to Bates Number MM7,
 25 00007. May 9, 2018, 5:56 p.m., this is Mr. Straub

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1 stating, I offered a car to Bob last night so he could
 2 drive something other than the four door. If you want the
 3 Escalade or the new -- it says porch, but I think he means
 4 Porsche, let me know.

5 And then you respond, hey, I don't need a
 6 car, mine is fine, but I need a job. When can I start
 7 working for you?

8 Again, what are you seeking to do for
 9 Mr. Straub there?

10 MR. SALAZAR: Objection to form and
 11 relevancy.

12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.

15 BY MR. LANDAU:

16 Q. Page MM11, 00011, are you there?

17 MR. MARIANI: That's in front of the
 18 witness.

19 BY MR. LANDAU:

20 Q. Text on May 17, 2018, 11:51 a.m. from
 21 Glenn Straub, beginning with sounds good. Do you see
 22 that?

23 MR. SALAZAR: What page? Tell me what
 24 number.

25 MR. LANDAU: May 17th at 11:51 a.m.

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1 MR. SALAZAR: I'm sorry, which MM?
 2 MR. LANDAU: 11.
 3 MR. SALAZAR: Oh, thank you.
 4 MR. MARIANI: It's in front of the witness.
 5 BY MR. LANDAU:
 6 Q. Mr. Straub says, sounds good tonight or
 7 tomorrow. Like you to meet the lady that has money.
 8 Trying to have her meet judge.
 9 Who is the judge there that Mr. Straub was
 10 referring to -- referring to, if you know?
 11 MR. SALAZAR: Objection, relevance.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. In fact, if you go to the yellow box at the
 17 bottom, text May 17, 2018, 4:26 p.m., the judge he's
 18 referring to is Judge Colbath; isn't that correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Have you discussed any of your legal
 25 problems with Judge Colbath?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. To your knowledge, has your husband,
 5 Bob Matthews, discussed any of his legal problems with
 6 Judge Colbath?
 7 A. On advice of counsel, I'm exercising my
 8 rights under the Fifth Amendment and decline to answer the
 9 question.
 10 Q. Flip to the next page, Ms. Matthews.
 11 MR. MARIANI: Page 12?
 12 MR. LANDAU: Yes, sir.
 13 MR. MARIANI: That's before the witness.
 14 BY MR. LANDAU:
 15 Q. May 18, 2018, 9:11 a.m. I think it's clear
 16 there you are borrowing Mr. Straub's Porsche; is that
 17 correct?
 18 MR. SALAZAR: Objection, relevancy.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. And this is at a time when your husband is
 24 in bankruptcy; isn't that correct?
 25 A. On advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
 2 question.
 3 MR. SALAZAR: Same objection.
 4 BY MR. LANDAU:
 5 Q. Page MM17.
 6 MR. MARIANI: That page is before the
 7 witness.
 8 BY MR. LANDAU:
 9 Q. Third yellow text down, May 20, 2018,
 10 8:46 p.m. Mr. Straub refers to you as a tease. Can you
 11 explain to us what's going on there?
 12 MR. SALAZAR: Objection to form and
 13 relevancy.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. Further down, later that night, 9:03 p.m.,
 19 you're meeting him at -- somewhere, it appears, for
 20 dinner; is that correct?
 21 MR. SALAZAR: Objection, relevancy.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. MM21.
 2 MR. MARIANI: That page is before the
 3 witness.
 4 BY MR. LANDAU:
 5 Q. May 24, 2018, 12:32 p.m. Mr. Straub says,
 6 go ahead, get whatever done you can tomorrow. Maybe we
 7 can see the diamond girl, and what you're going to call
 8 about in Fort Lauderdale on the way up or down.
 9 Ms. Matthews, who's the diamond girl?
 10 MR. SALAZAR: Objection, relevancy.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Was Mr. Straub buying you diamonds?
 16 MR. SALAZAR: Objection, relevancy.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. In fact, he was buying you jewelry, wasn't
 22 he?
 23 MR. SALAZAR: Same objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

40 (Pages 157 to 160)

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. The jewelry that he's referring to there,
 4 where is it, Ms. Matthews?
 5 MR. SALAZAR: Objection to form and
 6 relevancy.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. MM24. May 26, 2018, 6:39 p.m., Mr. Straub
 12 says to you, sorry to hear that the holiday weekend isn't
 13 going well unfortunately, you. You need to let me spice
 14 it up. Promise, no sex jokes, not going to Twin Peaks or
 15 here to watch game tonight. Would rather spend some time
 16 with you, but I will take what I can get up to a point.
 17 Breakfast, then tennis early for you, if you're up to some
 18 lessons. Shame about tonight, I was looking forward to
 19 tonight. Change your mind, call.
 20 Ms. Matthews, what's going on there?
 21 MR. SALAZAR: Objection, relevancy.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. I mean, you're clearly in a relationship
 2 with him; isn't that correct?
 3 MR. SALAZAR: Objection, relevancy.
 4 BY MR. LANDAU:
 5 Q. At that point in time?
 6 MR. SALAZAR: Objection, relevancy.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. Next page, MM25. 5/26/18, 11:39 p.m. Game
 12 over, back on the boat. Need to get some sleep, early
 13 breakfast with you, if possible, 8:00 or 8:30 a.m.?
 14 Tennis, Wellington; ten o'clock shower; 11:30 drive to
 15 look at three entertainment second generation centers that
 16 tied into two -- I don't even know, 200,000 or \$2 million
 17 rope course that I would finance -- that I would finance
 18 for you guys -- for you and guys like judge. We all would
 19 make millions. Let me know if you can't make it, and the
 20 judge and the one other will take off at around
 21 12 o'clock.
 22 What is Mr. Straub financing for you there?
 23 MR. SALAZAR: Objection to form and
 24 relevancy.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. Further down, May 27, 2018, 2:48 p.m. This
 5 is a text from Mr. Straub, Bob have been calling all day
 6 and you know how I feel. Call, please, if you have answer
 7 or any other ideas. Call, I would like to move on to
 8 other future items, please, or tell me my future.
 9 What is his future, Ms. Matthews?
 10 MR. SALAZAR: Objection, relevancy.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Next page, MM26, May 27, 2018, 8:07 p.m.,
 16 text from Mr. Straub, little bit better. Give me a
 17 month and I will make you feel a lot better, get some
 18 sleep, help your daughter, satisfy your life partner,
 19 finally put some money away for a rainy day.
 20 What is he offering you there, Ms. Matthews?
 21 MR. SALAZAR: Objection to form and
 22 relevancy.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. Page MM28, May 29, 2018, 5:30 p.m. This is
 3 a text from you to Mr. Straub. You say, e-mail you cruise
 4 itinerary.
 5 Did you go on a cruise with Mr. Straub?
 6 MR. SALAZAR: Objection to form and
 7 relevancy.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer that question.
 11 BY MR. LANDAU:
 12 Q. In fact, you did go on a cruise with
 13 Mr. Straub, didn't you?
 14 MR. SALAZAR: Same objection.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. Page MM31. May 31, 2018, 8:30 a.m.,
 20 Mr. Straub texted you, Bob can't have communication with
 21 me. Let's discuss that for a second.
 22 What does that mean, Bob can't have
 23 communication with me?
 24 MR. SALAZAR: Objection to form, relevance.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. Isn't it correct that that has to do with
 5 the Judge's prohibition of Bob communicating with Glenn in
 6 the Connecticut criminal action?
 7 MR. SALAZAR: Same objection.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. Page MM32, towards the bottom, May 31, 2018,
 13 10:20 a.m. B2W, which my kids tell me is by the way,
 14 Bianca wants to go to Colombia, lol.
 15 Are you asking Mr. Straub there to pay for
 16 your daughter to go to Colombia?
 17 MR. SALAZAR: Objection, relevancy.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. Next page, MM33, at the top, May 31, 2018,
 23 1:07 p.m., text from you to Glenn. I'm not far from
 24 Wellington. Can I drop off lawyer engaging letter for
 25 Craig to look at?

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1 Do you recall sending that text?
 2 MR. SALAZAR: Objection, relevancy.
 3 THE WITNESS: On advice of counsel, I'm
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. LANDAU:
 7 Q. And further down, May 31, 2018, at 2:42 p.m.
 8 Okay. Showed Craig the letter, what's next?
 9 Do you see that?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. So you did have Mr. Craig Galle review a
 16 letter for you; isn't that correct?
 17 MR. SALAZAR: Same objection.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. And who paid for Mr. Galle to review that
 23 letter?
 24 MR. SALAZAR: Same objection.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. Mister -- Mr. Straub paid for Mr. Galle to
 5 review that letter, isn't that correct?
 6 A. On advice --
 7 MR. SALAZAR: Same objection. Pardon me.
 8 THE WITNESS: -- of counsel, I'm exercising
 9 my rights under the Fifth Amendment and decline to answer
 10 the question.
 11 BY MR. LANDAU:
 12 Q. Next page, MM34, at the bottom, June 1,
 13 2018, 10:43 a.m., a text from you to Mr. Straub. You say
 14 send Zink number, please; correct?
 15 MR. SALAZAR: Objection, relevance.
 16 MR. MARIANI: The document is in front of
 17 the witness.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. And when you say Zink, you refer to
 23 Mr. Straub's attorney named, I believe is it Larry, yeah,
 24 Larry Zink; isn't that correct?
 25 MR. SALAZAR: Same objection.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. LANDAU:
 5 Q. Did you consult with Mr. Zink?
 6 A. On advice of counsel, I'm exercising my
 7 rights under the Fifth Amendment and decline to answer the
 8 question.
 9 MR. SALAZAR: Same objection.
 10 MR. MARIANI: Excuse me, Counsel. I'm going
 11 to take a break --
 12 MR. LANDAU: Okay.
 13 MR. MARIANI: -- to get the witness
 14 something to eat.
 15 MR. LANDAU: Yeah, I don't know why it's not
 16 here yet, that's weird.
 17 MR. MARIANI: No, I'm disappointed. It's
 18 quarter to 2:00 now, I think, or no, it's 1:30. We've
 19 been here since nine o'clock, but the witness didn't have
 20 breakfast, so I need to take a break and get her something
 21 to eat.
 22 MR. LANDAU: Okay.
 23 MR. MARIANI: How much longer are you going
 24 to have with this witness? I would like a representation
 25 about how much longer you're going to be with this

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1 witness.
 2 MR. LANDAU: John, I don't want to tell you
 3 wrong, because I just don't know.
 4 MR. MARIANI: I'm asking for an estimate.
 5 MR. LANDAU: Yeah, I don't know, however
 6 long it takes. I apologize.
 7 MR. MARIANI: I want to remind you, you set
 8 this for two hours, 11 ---
 9 MR. LANDAU: I did not set it for two hours.
 10 MR. MARIANI: Well, you said that one
 11 witness was going to start at 9:00, and one was going to
 12 start ---
 13 MR. LANDAU: I said Mr. Matthews immediately
 14 thereafter.
 15 MR. MARIANI: The notice we got said
 16 11:00 a.m. for Mr. Matthews, but I'd like you to give us
 17 an estimate because now we have multiple people waiting.
 18 I'm not trying to be --
 19 MR. LANDAU: Yeah, let me -- let me speak to
 20 Mr. George.
 21 MR. MARIANI: -- difficult, I'm trying to
 22 understand.
 23 MR. LANDAU: No, I'm trying -- I apologize,
 24 I'm not trying to be difficult at all.
 25 MR. MARIANI: Mia, let's leave, please.

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1 MR. LANDAU: You know, part of the problem
 2 is because of the assertion of the Fifth, it takes longer.
 3 MR. MARIANI: It should take less time.
 4 MR. LANDAU: No.
 5 (Thereupon, a lunch recess was taken, after
 6 which the following proceedings were had:)
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, I would -- we're back on the
 9 record.
 10 I would refer you to Bates Number MM35,
 11 June 1, 2018, 10:55 a.m. You say, I hope you know how
 12 grateful I am to you for this. It's literally going to
 13 change my life to know I have a lawyer. I've been very
 14 uneasy to say the least.
 15 Do you recall sending that text?
 16 A. On advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 MR. SALAZAR: I'm going to object on grounds
 20 of relevancy.
 21 BY MR. LANDAU:
 22 Q. And what you're referring to there is
 23 Mr. Straub's helping you retain counsel; is that correct?
 24 MR. SALAZAR: Same objection.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. And the next text is from Mr. Straub saying
 5 need number for your -- I'm assuming ATT means attorney,
 6 for conference call now, and then below that you provide a
 7 203 number, and then you say Brian Spears.
 8 Brian Spears is your criminal counsel;
 9 correct?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. And am I correct in what's happening here is
 16 Mr. Straub is participating in a conference call with both
 17 yourself and Brian Spears, your criminal attorney; is that
 18 correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Next page, MM36 towards the bottom, June 1,
 25 2018 at 10:41 p.m., Glenn Straub, you okay, you hungry,

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1 you want a drink, you hornet?
 2 What does he mean by hornet?
 3 MR. SALAZAR: Same objection.
 4 THE WITNESS: On advice of counsel, I'm
 5 exercising my rights under the Fifth Amendment and decline
 6 to answer the question.
 7 BY MR. LANDAU:
 8 Q. And then 39, June 2, 2018 at 11:50 a.m.,
 9 Mr. Straub sends a text to you. Did you receive your
 10 attorney signed agreement without any changes? If not
 11 Monday, please call, when will we ---
 12 And then you respond, yes, I did, and he
 13 sent to Zink, also.
 14 And then Mr. Straub responds, Larry has
 15 received and is e-mailing back verification of your
 16 attorney signed. Thanks.
 17 Again, my question, Ms. Matthews, am I
 18 correct that that's another example of Mr. Straub helping
 19 you with your legal matters?
 20 MR. SALAZAR: Same objection.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. MM45, June 5, 2018, 3:07 p.m., Mr. Straub

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1 texts you -- am I going too fast? I apologize. Are you
2 there?

3 MR. MARIANI: Yes, we have the page.

4 BY MR. LANDAU:

5 Q. Mr. Straub states, yes, all good. You ask
6 that what I do. Worker! Not a hypocrite. Rewritten and
7 will be sent in 15 minutes. Don't know how to send to
8 you, but Craig's office will send to the lawyer up north.
9 If you can't get a copy because Bob's lawyer shouldn't be
10 talking to you, that you should -- and then the next text
11 right after, not get into his lawyer, that's not
12 protected. Call me and I can read because this letter
13 will be discoverable.

14 What is Mr. Straub referring to there?

15 MR. SALAZAR: Same objection.

16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.

19 BY MR. LANDAU:

20 Q. In fact, he's giving you legal advice there;
21 is that correct?

22 MR. SALAZAR: Same objection.

23 THE WITNESS: On advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

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1 BY MR. LANDAU:

2 Q. And then below, 6 -- June 5, 2018,
3 4:37 p.m., Mr. Straub says, no problem, just keeping you
4 awake, if necessary, just to know if my investment is
5 okay.

6 What is his investment --

7 MR. SALAZAR: Same objection.

8 BY MR. LANDAU:

9 Q. -- Ms. Matthews?

10 MR. SALAZAR: Same objection.

11 THE WITNESS: On advice of counsel, I'm
12 exercising my rights under the Fifth Amendment and decline
13 to answer the question.

14 BY MR. LANDAU:

15 Q. You're the investment; isn't that correct?

16 MR. SALAZAR: Same objection.

17 THE WITNESS: On advice of counsel, I'm
18 exercising my rights under the Fifth Amendment and decline
19 to answer the question.

20 BY MR. LANDAU:

21 Q. MM57, June 11, 2018, 9:44 p.m., Mr. Straub
22 texts you, need to talk sometime tonight, if possible.

23 You respond, no problem, cooking Bianca
24 dinner. I'll be free soon.

25 Mr. Straub responds, private, please, ten

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1 minutes. And then Mr. Straub says, I'm asking too much.

2 You are able to choose your partners that you would have
3 companionship with, not being told that you should feel
4 guilty, not taking care of me like the others. We are
5 both adults and making out is something kid do. Sorry the
6 relationship came out as a form of tease and not a couple
7 with serious intention. I have only me to blame, not to
8 see this when you told me, show me first. Don't worry,
9 the two daughters will have an open door with me if they
10 want. Don't want to get in the middle of their parents
11 and them wanting their family to provide what I would have
12 been helping out with. I look at the kids as they never
13 had anything out of this kind of habits.

14 Ms. Matthews, what is Mr. Straub referring
15 to there?

16 MR. SALAZAR: Same objection.

17 THE WITNESS: On advice of counsel, I'm
18 exercising my rights under the Fifth Amendment and decline
19 to answer the question.

20 BY MR. LANDAU:

21 Q. Isn't it true that he's seeking to further
22 the affair with you in those texts?

23 MR. SALAZAR: Same objection.

24 THE WITNESS: On advice of counsel, I'm
25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.

2 BY MR. LANDAU:

3 Q. Let me ask you, Ms. Matthews, at that time
4 does your husband know this is going on?

5 MR. SALAZAR: Same objection.

6 THE WITNESS: On advice of counsel, I'm
7 exercising my rights under the Fifth Amendment and decline
8 to answer the question.

9 BY MR. LANDAU:

10 Q. MM61, June 13, 2018, 11:41 a.m., a text from
11 you to Mr. Straub. What do you think about leaving a
12 little earlier and meeting me at Saks outlet?

13 Further down, Mr. Straub responds, okay.

14 Just pick out what my little girl wants and use CC, or I
15 will be there on time.

16 I assume, Ms. Matthews, CC he means credit
17 card?

18 MR. SALAZAR: Objection, relevancy.

19 THE WITNESS: On advice of counsel, I am
20 exercising my rights under the Fifth Amendment and decline
21 to answer the question.

22 BY MR. LANDAU:

23 Q. MM62, June 14, 2018, 9:45 a.m., a text from
24 you to Mr. Straub. Can I use your card to take girls
25 shopping today? I was a very, very bad -- it was a very,

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1 very bad night for them, too.
 2 MR. SALAZAR: Objection, relevancy.
 3 MR. LANDAU: I didn't even ask a question.
 4 MR. SALAZAR: Oh, sorry. I thought you were
 5 done.
 6 BY MR. LANDAU:
 7 Q. My question, Ms. Matthews, is, again, that's
 8 an example of you using Mr. Straub's credit card to
 9 purchase goods for you and your family; is that not
 10 correct?
 11 MR. SALAZAR: Same objection.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. And then if you flip to the next page, MM63,
 17 you're texting Mr. Straub a picture of a credit card; is
 18 that correct?
 19 MR. SALAZAR: Same objection.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment to decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. And that's the credit card that Mr. Straub
 25 let you use, or as the complaint states, use unauthorized;

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1 is that correct?
 2 MR. SALAZAR: Same objection.
 3 THE WITNESS: On advice of counsel, I'm
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. LANDAU:
 7 Q. But I think it's clear, he clearly knows
 8 you're using his credit card; correct?
 9 MR. SALAZAR: Same objection.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. LANDAU:
 14 Q. Ms. Matthews, how did you get here today?
 15 MR. SALAZAR: Objection, relevance.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. Ms. Matthews, did you get here today using a
 21 vehicle that belongs to Mr. Straub?
 22 MR. SALAZAR: Same objection.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. LANDAU:
 2 Q. I'll take that as a yes.
 3 MR. SALAZAR: I guess objection to form.
 4 BY MR. LANDAU:
 5 Q. Ms. Matthews, do you have a wallet with you
 6 here today?
 7 MR. SALAZAR: Objection, relevancy.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. I'd like to see your wallet. Can you
 13 produce your wallet?
 14 MR. MARIANI: We're not going to produce her
 15 wallet.
 16 MR. LANDAU: Why not?
 17 MR. MARIANI: Because it's a personal item
 18 and you didn't ask for it with the subpoena. You have no
 19 right to see her wallet, so move on.
 20 BY MR. LANDAU:
 21 Q. Do you have in your wallet any credit cards
 22 belonging to Mr. Straub?
 23 MR. SALAZAR: Same objection.
 24 THE WITNESS: On advice of counsel, I'm
 25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.
 2 BY MR. LANDAU:
 3 Q. These texts end on October 25, 2018. Do you
 4 have on your cell phone any texts after that date from
 5 Mr. Straub?
 6 A. On advice of counsel, I'm exercising my
 7 rights under the Fifth Amendment and decline to answer the
 8 question.
 9 MR. SALAZAR: Same objection, relevancy.
 10 BY MR. LANDAU:
 11 Q. So, in fact, I'll take that as a yes, you do
 12 have texts from Mr. Straub after October 25, 2018?
 13 MR. SALAZAR: Objection, form and relevancy.
 14 BY MR. LANDAU:
 15 Q. Page MM 65, June 14, 2018, 4:14 p.m., a text
 16 from Mr. Straub to you, you already have figured out
 17 something else, put a Mrs. S, capital S, in front of your
 18 name and there's a little symbol of a ring.
 19 Is he asking you to marry him, is that the
 20 implication there Ms. -- Ms. Matthews?
 21 MR. SALAZAR: Same objection.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. Next page, MM66, June 14, 2018, 7:22 p.m.
 2 Mr. Straub says to -- sends a text to you, back sleeping
 3 with him...easy.
 4 Is Mr. Straub referring to that you're back
 5 sleeping with Mister -- your husband, Mr. Matthews?
 6 MR. SALAZAR: Same objection.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. He's jealous there, isn't he? Mr. Straub,
 12 he's jealous; correct?
 13 MR. SALAZAR: Same objection.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. LANDAU:
 18 Q. Your response, June 14, 2018, 7:24 p.m.,
 19 nope, and then you further say, wedge is bigger than ever;
 20 is that correct?
 21 MR. SALAZAR: Same objection.
 22 THE WITNESS: On advice of counsel, I'm
 23 exercising my rights under the Fifth Amendment and decline
 24 to answer the question.
 25 BY MR. LANDAU:

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1 Q. Page MM68, June 14, 2018, 9:44 p.m., a text
 2 from you to Mr. Straub. If our relationship is this
 3 fragile, we have a serious problem.
 4 9:56 p.m., he responds, you deserve a better
 5 life but you surround yourself with some that lies to you,
 6 and I can't seem to get you to understand.
 7 You respond, 9:57 p.m., I made a huge step
 8 last night.
 9 Are you referring there, Ms. Matthews, to
 10 telling Mr. Matthews that you will be leaving him?
 11 MR. SALAZAR: Objection on relevancy.
 12 THE WITNESS: On advice of counsel, I am
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. And then further down the page, later that
 17 night, Mr. Straub says to you, 10 -- 10:07 p.m., one drink
 18 at Imoto?
 19 MR. SALAZAR: Objection, relevancy.
 20 BY MR. LANDAU:
 21 Q. And then he further says -- it looks like
 22 he's trying to say Improv. Did you have a drink later
 23 that night with him, Ms. -- Ms. Matthews?
 24 MR. SALAZAR: Same objection, relevancy.
 25 THE WITNESS: On advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
 2 to answer the question.
 3 BY MR. LANDAU:
 4 Q. He then further says, 10:27 p.m.,
 5 Mr. Straub's text to you, is that a threat just like my
 6 over \$400,000 gamble?
 7 MR. SALAZAR: Same objection.
 8 BY MR. LANDAU:
 9 Q. Ms. Matthews, what is he referring to there?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Mr. Straub's \$400,000 gamble has to do with
 16 the EB-5 investments; doesn't it?
 17 MR. SALAZAR: Same objection.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. I'll take that as a yes.
 23 MR. SALAZAR: Objection to form.
 24 BY MR. LANDAU:
 25 Q. MM69, June 14, 2018, 10:47 p.m.,

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1 Glenn Straub text to you, I waited this long to be with
 2 you and help hurting people like your husband put you into
 3 a fucking mess, and you listen to those continue lies and
 4 think you are hearing me give you advice. A salesman can
 5 sell people anything. I thought you were coming around.
 6 I hope my kids will remember what dad told them, how to
 7 look through corners, I'm assuming it says.
 8 What is Mr. Straub referring to there,
 9 Ms. Matthews?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. You respond, I'm shocked and disappointed by
 16 all this, and then you further say, call me; is that
 17 correct?
 18 MR. SALAZAR: Same objection.
 19 THE WITNESS: On advice of counsel, I'm
 20 exercising my rights under the Fifth Amendment and decline
 21 to answer the question.
 22 BY MR. LANDAU:
 23 Q. But then the following day, June 15, 2018,
 24 this is on MM70, you text Mr. Straub, if Bianca goes to
 25 New York, will you pay for her training? It's a hundred

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1 dollars per hour, a couple hours a day, so it won't be
 2 cheap?
 3 Why are you asking Mr. Straub to pay for
 4 training for your daughter?
 5 MR. SALAZAR: Are you done? Sorry, is that
 6 the question?
 7 Objection, relevancy.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. LANDAU:
 12 Q. MM75, June 18, 2018, 10:44 a.m., a text from
 13 you to Mr. Straub. I think I may give her the little
 14 hoops you bought me. Is that okay with you?
 15 And you're referring to -- is that referring
 16 to earrings that you want to give to your daughter that
 17 were given to you by Mr. Straub?
 18 MR. SALAZAR: Objection, no relevancy
 19 between this and bidding on a hotel in Palm Beach.
 20 BY MR. LANDAU:
 21 Q. You can answer.
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 Q. Mr. Straub responds on June 18, 2018, okay,

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1 and then he says, as you know, the prices of gold doubled,
 2 so I get one BJ for each side over three days.
 3 MR. SALAZAR: Are you done? Is there a
 4 question there?
 5 I want to express my embarrassment on your
 6 behalf, Phil, and I object on the grounds of relevancy and
 7 to form.
 8 MR. LANDAU: And I'm embarrassed that we
 9 have to be here reading through this.
 10 MR. SALAZAR: You should -- you should be,
 11 you're driving the train.
 12 BY MR. LANDAU:
 13 Q. Ms. Matthews, again, it seems pretty clear
 14 that you have a deep relationship, and close and personal
 15 insider relationship with Mr. Straub, is that -- isn't
 16 that correct?
 17 MR. SALAZAR: Objection, relevancy, form.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. Further down the page, June 19, 2018,
 23 8:32 a.m., Mr. Straub's text to you, congratulations on
 24 another job. I think I'm going to marry you and live off
 25 you, you know, like a kept woman. I'm going -- I'm good

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1 on something new, get up and work.
 2 What was your response to that,
 3 Ms. Matthews?
 4 MR. SALAZAR: Same objection.
 5 THE WITNESS: On advice of counsel, I'm
 6 exercising my rights under the Fifth Amendment and decline
 7 to answer the question.
 8 BY MR. LANDAU:
 9 Q. MM80, June 20, 2018, 2:42 p.m., text from
 10 Glenn Straub to you.
 11 If you're not going to go to New York and
 12 not call me back about tickets for you and my flight and
 13 hotel for a couple of days of shopping and shows like we
 14 were going to do, then please call for three minutes so I
 15 know how to proceed, and that you're not just busy helping
 16 your daughter and not changed your mind.
 17 Ms. Matthews, did you, in fact, go with
 18 Mr. Straub to New York?
 19 MR. SALAZAR: Objection, relevancy.
 20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.
 23 BY MR. LANDAU:
 24 Q. Next page, MM81. June 21, 2018, 8:34 a.m.,
 25 text from Mr. Straub to you. Based on our -- based on

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1 your conversation, if you don't change your mind that you
 2 are leaving Bob and looking around for a while before
 3 settling down, if ever again. I can't believe your
 4 attorney hasn't highly recommended that choice already
 5 because as these prosecution continue, each individual
 6 will have their own story, and the federal boys in EB-5,
 7 whoever they are at that time, and other, in legal terms,
 8 interested parties like me, will treat you defender each
 9 different. Bob will have a different story to tell to
 10 reduce his time and you will have your -- because it would
 11 be suicide for you to get dragged into his mess.
 12 Ms. Matthews, what is Mr. Straub referring
 13 to there?
 14 MR. SALAZAR: Objection, irrelevant.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. In fact, he's trying to scare you, isn't he?
 20 MR. SALAZAR: Same objection.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. MM86, June 23, 2018, 11:42 a.m., you text

47 (Pages 185 to 188)

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1 Mr. Straub, Hamilton, Come Far Away, Harry Potter, and
 2 then you say in parens, not a musical, Dear Evan Hansen,
 3 Once on This Island.
 4 Ms. Matthews, those are all names of
 5 Broadway shows, are they not?
 6 MR. SALAZAR: Objection, relevancy, although
 7 I do recommend Hamilton and Evan, excellent.
 8 BY MR. LANDAU:
 9 Q. Ms. Matthews -- Ms. Matthews, I don't
 10 believe you answered.
 11 A. On advice of counsel, I'm exercising my
 12 rights under the Fifth Amendment and decline to answer the
 13 question.
 14 MR. SALAZAR: Objection, relevancy.
 15 BY MR. LANDAU:
 16 Q. Ms. Matthews, I notice that you're crying.
 17 Why are you crying?
 18 MR. SALAZAR: Wow, Phil, objection,
 19 irrelevant.
 20 MR. STRAUB: She's an actress.
 21 (Mr. Mariani and Ms. Matthews confer.)
 22 MR. LANDAU: Mr. Mariani, there's a question
 23 pending.
 24 MR. MARIANI: I understand.
 25 THE WITNESS: My eyes are watering from

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1 yawning and from not getting a lot of -- from working
 2 hard.
 3 BY MR. LANDAU:
 4 Q. Okay. What kind of work? What do you do,
 5 what kind of work?
 6 MR. SALAZAR: Objection, relevancy.
 7 THE WITNESS: On advice of counsel, I'm
 8 exercising my rights under the Fifth Amendment and decline
 9 to answer the question.
 10 BY MR. LANDAU:
 11 Q. So as we go further through this, in the
 12 next few days, you then, in fact, go to New York with
 13 Mr. Straub, don't you?
 14 A. On the advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 MR. SALAZAR: Object to relevancy, same
 18 objection.
 19 BY MR. LANDAU:
 20 Q. MM87, June 23, 2018, it appears that you're
 21 texting what looks like a picture of a ticket, a show
 22 ticket or a ticket to an event; is that correct?
 23 A. On advice of --
 24 MR. SALAZAR: Objection, irrelevant.
 25 THE WITNESS: -- counsel, I am exercising my

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1 rights under the Fifth Amendment and decline to answer the
 2 question.
 3 BY MR. LANDAU:
 4 Q. And then June 23, 2018, 6:44 p.m., we're now
 5 on MM88, a text from you to Mr. Straub. I'm ready when
 6 you are to leave.
 7 And then at 7:05 p.m., Mr. Straub responds,
 8 45th between 8th and 9th. Theater again? In taxi.
 9 Ms. Matthews, you're clearly in New York
 10 there; correct?
 11 MR. SALAZAR: Objection, relevancy.
 12 THE WITNESS: On advice of counsel, I'm
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 BY MR. LANDAU:
 16 Q. And then you respond 7th and 8th,
 17 John Golden Theatre. Where is the John Golden Theatre,
 18 Ms. Matthews?
 19 A. On advice of counsel, I'm exercising my
 20 rights under the Fifth Amendment and decline to answer the
 21 question.
 22 MR. SALAZAR: Object on the grounds of
 23 relevancy. The theatre has nothing to do with this credit
 24 bid motion.
 25 BY MR. LANDAU:

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1 Q. MM92, June 25, 2018, 9:16 p.m., Glenn Straub
 2 texts you saying, I guess the reason I'm real busy is
 3 because we checked and double checked the draft of the
 4 suit that you will get before it gets filed. If you text
 5 me an e-mail or hotel number, I can send it tomorrow so
 6 you have an idea that we would be flying under. It will
 7 be marked draft and is being changed up to bring filed
 8 with the secretary or state and up north. Read, and if
 9 you have questions or want to talk before it is put out to
 10 the public, call. After you read, you will see why I
 11 couldn't call as much. We have to -- we have to have
 12 evidence for each point to prove the claims. Good luck.
 13 What is happening there, Ms. Matthews?
 14 MR. SALAZAR: Same objection, irrelevance.
 15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.
 18 BY MR. LANDAU:
 19 Q. In fact, Mr. Straub there is threatening you
 20 with filing the lawsuit that was ultimately filed in
 21 St. Lucie County; isn't that correct?
 22 MR. SALAZAR: Same objection.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

48 (Pages 189 to 192)

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1 BY MR. LANDAU:
2 Q. MM95, July 3, 2018, 1:19 p.m., Mr. Straub's
3 text to you, found a county that will keep these facts out
4 of the public eyes and your daughter friends' gossip.
5 Planning a lot of things that I have to get done in the
6 next six days, so unless I can work out something with
7 these items verbally, the different claims will be shown.
8 Just remember, when you called for help, I was the only
9 one that came through and now you can't remember. Shame
10 on you.
11 Ms. Matthews, my question is: Isn't it true
12 Mr. Straub is referring to the complaint that -- that he
13 was about to file in St. Lucie County?
14 A. On advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.
17 MR. SALAZAR: Same objection on the grounds
18 of relevancy.
19 BY MR. LANDAU:
20 Q. Where he says found a county, that was -- he
21 was referring to St. Lucie County; correct?
22 MR. SALAZAR: Same objection.
23 THE WITNESS: On advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

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1 BY MR. LANDAU:
2 Q. Explain to me why on the one hand he's
3 threatening to sue you, but then on the other hand trying
4 to protect your privacy?
5 MR. SALAZAR: Objection, relevancy.
6 THE WITNESS: On advice of counsel, I'm
7 exercising my rights under the Fifth Amendment and decline
8 to answer the question.
9 BY MR. LANDAU:
10 Q. Isn't it because you and Mr. Straub have a
11 very complicated relationship?
12 MR. SALAZAR: Objection, relevancy.
13 THE WITNESS: On advice of counsel, I'm
14 exercising my rights under the Fifth Amendment and decline
15 to answer the question.
16 BY MR. LANDAU:
17 Q. And so that was on July 3, 2018, and the
18 complaint that we've already marked as Exhibit 10, was
19 filed on July 5, 2018; isn't that correct?
20 MR. SALAZAR: Objection on relevancy.
21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.
24 BY MR. LANDAU:
25 Q. Ms. Matthews, has the Broward County Public

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1 Attorney or District Attorney discussed any of this with
2 you?
3 MR. SALAZAR: Same objection.
4 THE WITNESS: On advice of counsel, I'm
5 exercising my rights under the Fifth Amendment and decline
6 to answer the question.
7 BY MR. LANDAU:
8 Q. Are you aware that Mr. Straub is being
9 investigated by the Broward County attorney for
10 allegations similar to what's going on here?
11 MR. SALAZAR: Object on the grounds of
12 relevance to the credit bid motion that's pending, there's
13 none whatsoever.
14 BY MR. LANDAU:
15 Q. You can answer.
16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.
19 Q. MM98, July 16, 2018, 1:10 p.m., text from
20 you to Mr. Straub. Well, the weekend is over. So as bad
21 my situation is, I can't accept your offer to be a
22 significant other in order for you to drop the lawsuit.
23 This whole thing is heart breaking. I can't say that we
24 would end up together, but I will say any hopes of that
25 are dashed with your recent actions and behavior. Being

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1 with someone who threatens to put me in jail, promises
2 things, then takes them away, and tells me that he will do
3 whatever he can to destroy me, won't work. I wish things
4 were different.
5 So in sending that text, you're expressing
6 to Mr. Straub you're not going to -- you're -- you're
7 ending your relationship with him; is that accurate?
8 MR. SALAZAR: Objection to relevancy.
9 THE WITNESS: On advice of counsel, I'm
10 exercising my rights under the Fifth Amendment and decline
11 to answer the question.
12 BY MR. LANDAU:
13 Q. MM99, July 17, 2018, 12:21 p.m., text from
14 Mr. Straub to you, just finished Bob's local lawyer and
15 will have hours next week with his federal criminal
16 lawyer. You are playing with fire, not helping, instead
17 just turning your head. Listen, you're out of your
18 acting/mother/smart person league. Get on board or you
19 will lose everything. I'm getting tired of this type of
20 unappreciated work.
21 And then he follows up with a text later on
22 that afternoon, 2:05 p.m., I see one more piece of the
23 puzzle, you don't understand my way, and then he writes
24 Mia Matthews at me.com, provide your Social Security
25 number and date of birth, and he goes, you're just a kid.

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1 Why is -- what is he trying to express in
2 those texts?
3 MR. SALAZAR: Objection, relevancy.
4 THE WITNESS: On advice of counsel, I'm
5 exercising my rights under the Fifth Amendment and decline
6 to answer the question.
7 BY MR. LANDAU:
8 Q. In fact, you respond, July 18, 2018,
9 9:16 a.m. saying, I've tried to reason with you, but
10 threats and intimidation don't -- do not work to get me to
11 be with you, they only work to terrify me. Please don't
12 communicate with me anymore.
13 Did Mr. Straub continue to communicate with
14 you after that text?
15 MR. SALAZAR: Objection, relevancy.
16 THE WITNESS: On advice of counsel, I'm
17 exercising my rights under the Fifth Amendment and decline
18 to answer the question.
19 BY MR. LANDAU:
20 Q. In fact, he did continue to communicate with
21 you, didn't he?
22 A. On advice of counsel, I'm exercising my
23 rights under the Fifth Amendment and decline to answer the
24 question.
25 MR. SALAZAR: Sorry, same objection,

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1 relevancy.
2 BY MR. LANDAU:
3 Q. MM103. August 8, 2018, 1:23 p.m., a text
4 from you to Mr. Straub. I talked to him. Told him the
5 truth. He was relieved we didn't have sexual contact.
6 And understood my desperation in trying to get you to back
7 off the lawsuit. He won't be showing up anywhere. No
8 worries.
9 When you say I talked to him, are you
10 referring to your husband, Robert Matthews?
11 MR. SALAZAR: Same objection.
12 THE WITNESS: On the advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.
15 BY MR. LANDAU:
16 Q. Later that day, 1:52 p.m., a text from
17 Mr. Straub to you. Today started seven hours ago and the
18 phone shows seven calls tried to this phone, don't worry.
19 I don't leave my guard down ever. You're just putting a
20 bandage on a gaping hole. Last night was no different
21 than any -- than any other evening with me. I'm looking
22 for more out of a relationship. \$600 room and \$500 cash
23 isn't going to do it, but continue teasing me, will show
24 you how the real world works. Good luck on your alliance.
25 Hard work usually wins. Too bad you're brainwashed.

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1 Things not going to get better. You are going to live
2 this way for some time.
3 Ms. Matthews, my question to you is: What
4 is Mr. Straub referring to there when he says \$600 room
5 and \$500 cash?
6 MR. SALAZAR: Same objection.
7 THE WITNESS: On advice of counsel, I'm
8 exercising my rights under the Fifth Amendment and decline
9 to answer the question.
10 BY MR. LANDAU:
11 Q. Did you further your affair with him, is
12 that what he's referring to?
13 A. On advice of counsel, I'm exercising my
14 rights under the Fifth Amendment and decline to answer the
15 question.
16 MR. SALAZAR: Sorry, I have an objection to
17 the form of that question and to its relevancy.
18 MR. LANDAU: Guys, I apologize, I only have
19 one copy of this, but it's a check I just want to ask
20 Ms. Matthews about.
21 MR. GEORGE: It's going to be 15.
22 MR. SALAZAR: It must have something to do
23 with the credit bid motion filed eight years later.
24 (Thereupon, Exhibit Number 15 was marked for
25 Identification.)

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1 BY MR. LANDAU:
2 Q. Ms. Matthews ---
3 MR. SALAZAR: Sorry, can I take a quick
4 look?
5 MR. LANDAU: Sure.
6 BY MR. LANDAU:
7 Q. I'm showing you what's been marked as
8 Exhibit 15, a check from 160 Royal Palm, LLC, and it's
9 paid to Chapman & Galle trust account for \$60,000, and in
10 the memo line it says escrow for house.
11 Have you seen this document before?
12 A. On advice of counsel, I'm exercising my
13 rights under the Fifth Amendment and decline to answer the
14 question.
15 MR. SALAZAR: Sorry, objection on relevancy.
16 BY MR. LANDAU:
17 Q. The notation escrow for house, does this
18 refer to money being paid related to your house?
19 A. On advice of counsel, I'm exercising my
20 rights under the Fifth Amendment and decline to answer the
21 question.
22 MR. SALAZAR: I'm sorry. Same objection,
23 relevancy.
24 MR. GEORGE: What's the date of the check?
25 MR. SALAZAR: September 2010.

50 (Pages 197 to 200)

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1 MR. MARIANI: September 2, 2010.
 2 MR. GEORGE: Thank you.
 3 BY MR. LANDAU:
 4 Q. In fact, Ms. Matthews, isn't it true that
 5 this money -- this does represent \$60,000 that went to one
 6 of your homes?
 7 MR. SALAZAR: Same objection, irrelevant.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 MR. LANDAU: Mark this as 16. I only have
 12 one.
 13 (Thereupon, Exhibit Number 16 was marked for
 14 Identification.)
 15 BY MR. LANDAU:
 16 Q. Ms. Matthews, the document that we have
 17 marked as Exhibit 16, this is a debtor-in-possession
 18 monthly operating report that was filed in your husband's
 19 bankruptcy case on November 20, 2018.
 20 Is that the document you have in front of
 21 you?
 22 MR. MARIANI: That's before the witness.
 23 BY MR. LANDAU:
 24 Q. Okay. Ms. Matthews, have you ever seen this
 25 document before?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. And I would ask you to turn to the first
 5 page or actually it's Page 2 of 8. Actually, let's flip
 6 to the next page, 3 of 8, and this document shows
 7 beginning cash of \$12,394.56. Do you see that?
 8 MR. MARIANI: It's before the witness.
 9 BY MR. LANDAU:
 10 Q. Okay. My question to you is: Where did
 11 that -- what are the sources of that money?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 MR. SALAZAR: Which number are you looking
 16 at, this 12,000 number?
 17 MR. LANDAU: Correct, yes.
 18 MR. SALAZAR: You're asking what the
 19 source ---
 20 MR. LANDAU: Of that money is, yes.
 21 MR. SALAZAR: Is it related somehow to this
 22 credit bid motion?
 23 MR. LANDAU: It is.
 24 BY MR. LANDAU:
 25 Q. Ms. Matthews, do you and your husband,

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1 Robert Matthews, do you discuss your personal finances
 2 with each other?
 3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.
 6 MR. SALAZAR: Objection, relevancy.
 7 BY MR. LANDAU:
 8 Q. So I assume that the two of you do discuss
 9 your personal finances together; isn't that correct?
 10 MR. SALAZAR: Same objection.
 11 THE WITNESS: On advice of counsel, I'm
 12 exercising my rights under the Fifth Amendment and decline
 13 to answer the question.
 14 BY MR. LANDAU:
 15 Q. Let's go through the disbursements.
 16 Mr. Matthews lists here \$766.39 for household expenses,
 17 food and clothing.
 18 Can you tell us what was purchased with that
 19 money?
 20 MR. SALAZAR: Same objection.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. LANDAU:
 25 Q. You live in a large home in Palm Beach;

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1 correct?
 2 A. On advice of counsel, I'm exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.
 5 Q. And, Ms. Matthews, the costs to maintain a
 6 home of that stature are quite expensive; isn't that
 7 correct?
 8 MR. SALAZAR: Same objection, relevancy.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. What does the electric bill run each month
 14 on a home like that?
 15 MR. SALAZAR: Same objection.
 16 THE WITNESS: On advice of counsel, I'm
 17 exercising my rights under the Fifth Amendment and decline
 18 to answer the question.
 19 BY MR. LANDAU:
 20 Q. What does the landscaper cost each month for
 21 your home on Palm Beach?
 22 MR. SALAZAR: Same objection.
 23 THE WITNESS: On advice of counsel, I'm
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

51 (Pages 201 to 204)

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1 BY MR. LANDAU:
 2 Q. So you're going to refuse to answer any
 3 question regarding your or your husband's monthly living
 4 expenses; is that correct?
 5 A. On advice of counsel, I'm exercising my
 6 rights under the Fifth Amendment and decline to answer the
 7 question.
 8 MR. SALAZAR: Objection, relevancy.
 9 BY MR. LANDAU:
 10 Q. If these same questions were asked by the
 11 bankruptcy judge in your husband's bankruptcy case, would
 12 you be providing the exact same answer you're providing me
 13 here today?
 14 MR. SALAZAR: Objection, form and relevance.
 15 MR. MARIANI: I'll object to the form, as
 16 well.
 17 BY MR. LANDAU:
 18 Q. You can answer.
 19 A. Oh. On advice of counsel, I'm exercising my
 20 rights under the Fifth Amendment and decline to answer the
 21 question.
 22 Q. Ms. Matthews, I'd ask you to flip to Page 6
 23 of 8. Are you there?
 24 MR. MARIANI: The page is before the
 25 witness.

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1 BY MR. LANDAU:
 2 Q. And I'd direct your attention to where it
 3 says date of check, October 1st, Top Nails, and it says
 4 purpose or description, nails. It's hard to read the
 5 number, \$86, \$86.22, or no, no, no, \$44.
 6 Do you see that, Ms. Matthews?
 7 MR. MARIANI: Check at Item 10/1?
 8 MR. LANDAU: I believe it's \$44.
 9 MR. MARIANI: Date of check, 10/1?
 10 MR. LANDAU: Yes.
 11 MR. MARIANI: I've pointed that out to the
 12 witness.
 13 BY MR. LANDAU:
 14 Q. Ms. Matthews, isn't it true that that's
 15 money spent for you getting your nails done; correct?
 16 MR. SALAZAR: Objection to relevancy.
 17 THE WITNESS: On advice of counsel, I'm
 18 exercising my rights under the Fifth Amendment and decline
 19 to answer the question.
 20 BY MR. LANDAU:
 21 Q. October 18th, Lodus, haircut, \$55. Isn't it
 22 true that that expense is related to your getting a
 23 haircut?
 24 MR. SALAZAR: Objection, it's completely
 25 irrelevant to our case.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 MR. LANDAU: Let's mark that as 17.
 5 (Thereupon, Exhibit Number 17 was marked for
 6 Identification.)
 7 BY MR. LANDAU:
 8 Q. Ms. Matthews, the document that I put in
 9 front of you labelled Exhibit 17 is the first amended
 10 Chapter 11 plan of reorganization of Robert Matthews.
 11 This is the Chapter 11 plan that has been filed in your
 12 husband's bankruptcy case.
 13 Are you familiar with this document?
 14 A. On advice of counsel, I am exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 MR. SALAZAR: Objection on relevancy.
 18 BY MR. LANDAU:
 19 Q. Has Mr. Matthews reviewed with you the terms
 20 of this plan of reorganization?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 Q. So isn't it true that Mr. Matthews has, in
 25 fact, reviewed with you this document?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. Isn't it true, Ms. Matthews, that
 5 Mr. Matthews has indicated to you that he has no intention
 6 of pursuing any litigation against you in the Bankruptcy
 7 Court with regard to his plan of reorganization?
 8 MR. SALAZAR: Objection, relevancy.
 9 THE WITNESS: On advice of counsel, I'm
 10 exercising my rights under the Fifth Amendment and decline
 11 to answer the question.
 12 BY MR. LANDAU:
 13 Q. Any causes of action that he may have or his
 14 bankruptcy estate may have against you, he has indicated
 15 to you that he has no intention of pursuing; isn't that
 16 correct?
 17 MR. SALAZAR: Same objection.
 18 THE WITNESS: On advice of counsel, I'm
 19 exercising my rights under the Fifth Amendment and decline
 20 to answer the question.
 21 BY MR. LANDAU:
 22 Q. Isn't it true that all -- any and all
 23 financial projections in this document are false?
 24 MR. SALAZAR: Same objection.
 25 THE WITNESS: On advice of counsel, I'm

52 (Pages 205 to 208)

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1 exercising my rights under the Fifth Amendment and decline
2 to answer the question.

3 BY MR. LANDAU:

4 Q. Isn't it true that Mr. Matthews would have
5 no means of implementing this plan of reorganization?

6 MR. SALAZAR: Same objection.

7 THE WITNESS: On advice of counsel, I'm
8 exercising my rights under the Fifth Amendment and decline
9 to answer the question.

10 BY MR. LANDAU:

11 Q. Isn't it true, Ms. Matthews, that the
12 treatment provided to the EB-5 investors under this plan
13 is completely illusory?

14 A. On advice of counsel, I'm --

15 MR. SALAZAR: Objection to form and ---

16 THE WITNESS: -- exercising my rights under
17 the Fifth Amendment and decline to answer the question.

18 MR. SALAZAR: Objection to form and
19 relevance.

20 BY MR. LANDAU:

21 Q. Ms. Matthews, if called to testify in
22 support of this plan of reorganization, will you be
23 asserting your Fifth Amendment privileges?

24 MR. SALAZAR: Same objections.

25 THE WITNESS: On the advice of counsel, I'm

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1 exercising my rights under the Fifth Amendment and decline
2 to answer the question.

3 MR. LANDAU: Let's take -- can we take a ---

4 MR. SALAZAR: Two-hour break?

5 MR. LANDAU: No, not a two-hour break, a
6 ten-minute break?

7 MR. SALAZAR: Okay.

8 (Thereupon, a brief recess taken, after
9 which the following proceedings were had:)

10 MR. LANDAU: I have nothing further.
11 Mr. George has some questions.

12 MR. GEORGE: Do you have questions?

13 MR. SALAZAR: I don't know, I'm still
14 thinking about it.

15 (Thereupon, Exhibit Number 18 was marked for
16 Identification.)

17 CROSS-EXAMINATION

18 BY MR. GEORGE:

19 Q. Ms. Matthews, my name is David George, I'm
20 with the law firm of George Gesten McDonald and I
21 represent the EB-5 investors in this case.

22 I'm going to be asking you a few questions.
23 If there are any questions you don't understand, please
24 ask me to repeat them and I will, otherwise I'm going to
25 assume that you understand my questions; is that okay?

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1 A. Yes.

2 Q. Now, earlier Mr. Landau showed you
3 Exhibit 9, which was a copy of a brochure that had your
4 picture in it, do you recall him doing that?

5 A. On advice of counsel, I'm exercising my
6 rights under the Fifth Amendment and decline to answer the
7 question.

8 Q. Isn't it true that this brochure held you
9 out as being a principal of the Palm House Hotel?

10 A. On advice of counsel, I'm exercising my
11 rights under the Fifth Amendment and decline to answer the
12 question.

13 Q. And, in fact, you allowed yourself to be
14 held out to the public as a principal of the Palm House
15 Hotel, didn't you?

16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.

19 Q. And you knew that this brochure was going to
20 be used by the Palm House Hotel to help raise money from
21 EB-5 investors, didn't you?

22 MR. SALAZAR: Objection, relevancy.

23 THE WITNESS: On advice of counsel, I'm
24 exercising my rights under the Fifth Amendment and decline
25 to answer the question.

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1 BY MR. GEORGE:

2 Q. And, in fact, this brochure was utilized to
3 raise funds from EB-5 investors in connection with the
4 Palm House project, wasn't it?

5 A. On advice of counsel, I'm exercising my
6 rights under the Fifth Amendment and decline to answer the
7 question.

8 Q. Let me show you what's been marked as
9 Exhibit 18, which is a notice of filing EB-5 creditors'
10 third amended complaint seeking damages and injunctive
11 relief in this bankruptcy case.

12 Do you have that document in front of you?

13 MR. MARIANI: Exhibit 18 is before the
14 witness.

15 MR. GEORGE: Thank you.

16 BY MR. GEORGE:

17 Q. I'd ask you to turn to Paragraph 14C of that
18 document, which appears on Page 7.

19 MR. SALAZAR: Do you mean 7 down here or 7
20 on top?

21 MR. GEORGE: Page 7 of the complaint, also
22 Page 7 on top.

23 MR. SALAZAR: This one here. Got it, sorry.

24 MR. MARIANI: The subparagraph, please, 14C?

25 MR. GEORGE: Paragraph 14C. Please let me

53 (Pages 209 to 212)

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1 know when you're ready for me to ask you questions about
2 that.

3 MR. MARIANI: It's before the witness.

4 BY MR. GEORGE:

5 Q. Ms. Matthews, do you see where Paragraph C
6 says the bad actors materially, indeed, crucially
7 represented, among other things, that, and then it has a
8 list of subparagraphs?

9 Do you see that before you?

10 MR. MARIANI: That's before the witness.

11 BY MR. GEORGE:

12 Q. Now, isn't it true that the -- there were
13 representations made to the EB-5 investors that there
14 would be a 100 percent guarantee for the return of their
15 investment and fees in the event their I-5 26 petitions
16 were denied with respect to the Palm House Hotel?

17 MR. SALAZAR: Objection to form and
18 relevance.

19 THE WITNESS: On advice of counsel, I'm
20 exercising my rights under the Fifth Amendment and decline
21 to answer the question.

22 MR. GEORGE: Luis, I'm going to ask you
23 respectfully to limit your objections to objections to
24 form, which as I'm sure you know, are the only proper
25 objections ---

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1 MR. SALAZAR: Relevance -- relevancy ---

2 MR. GEORGE: Excuse me, let me finish
3 talking, please.

4 MR. SALAZAR: Sure.

5 MR. GEORGE: Your relevance objections are
6 preserved for trial, as you know, and I'm going to ask you
7 to limit your objections to proper deposition objections.

8 MR. SALAZAR: I think relevance is proper.
9 So you're saying you'll preserve -- you're stipulating
10 that I am objecting to the relevance of every question?

11 MR. GEORGE: If you would like, sure.

12 MR. SALAZAR: Okay. Deal.

13 BY MR. GEORGE:

14 Q. Mrs. Matthews, isn't it true that the
15 Palm House Hotel project was seeking to raise money
16 through EB-5 investors?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. And isn't it true that you knew that to be
21 the case at all times since your husband regained
22 ownership of the Palm House Hotel property?

23 A. On advice of counsel, I'm exercising my
24 rights under the Fifth Amendment and decline to answer the
25 question.

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1 Q. And as we discussed earlier, you allowed
2 yourself to be held out to the public as a principal of
3 the Palm House Hotel?

4 A. On advice of counsel, I'm exercising my
5 rights under the Fifth Amendment and decline to answer the
6 question.

7 Q. And, in fact, that statement that's listed
8 in C-I, that there was a hundred percent guarantee for the
9 return of plaintiffs' investment and fees in the event
10 their I-5 26 petitions were denied, is a falsehood?

11 MR. SALAZAR: Objection to form.

12 BY MR. GEORGE:

13 Q. Isn't that right?

14 A. On advice of counsel, I am exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.

17 Q. Isn't it true that that was a lie that was
18 told to the EB-5 investors by the principals of the
19 Palm House Hotel project?

20 MR. SALAZAR: Objection to form.

21 THE WITNESS: On the advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 BY MR. GEORGE:

25 Q. Directing you to Paragraph C-II, it says

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1 100 percent of plaintiffs' funds would be held in escrow
2 until their Form I-5 26 immigration petitions were
3 approved by USCIS.

4 Isn't it true that was an additional
5 representation that was made to the EB-5 investors in
6 order to induce them to invest in the Palm House Hotel
7 project?

8 MR. SALAZAR: Objection to form.

9 THE WITNESS: On advice of counsel, I'm
10 exercising my rights under the Fifth Amendment and decline
11 to answer the question.

12 BY MR. GEORGE:

13 Q. And, in fact, that representation was made
14 by the principals of the Palm House Hotel, wasn't it?

15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.

18 MR. SALAZAR: Objection to form.

19 BY MR. GEORGE:

20 Q. And, in fact, that statement is also a lie,
21 isn't it?

22 A. On advice of counsel, I'm exercising my
23 rights under the Fifth Amendment and decline to answer the
24 question.

25 Q. Isn't it true that there wasn't even an

54 (Pages 213 to 216)

Page 217

1 escrow account created in connection with the EB-5
2 investors' money?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 Q. And isn't it a fact that not one single EB-5
7 investor had their I-5 26 petition approved in connection
8 with the Palm House Hotel project?

9 A. On advice of counsel, I'm exercising my
10 rights under the Fifth Amendment and decline to answer the
11 question.

12 MR. SALAZAR: Would you hold on for a
13 second, David?

14 Go ahead. I'm sorry.

15 MR. GEORGE: That's okay. May I continue?

16 MR. SALAZAR: Yes, please.

17 BY MR. GEORGE:

18 Q. Okay. Directing you to Paragraph C-III,
19 which says, a limited number of 79 equity interests would
20 be sold in Palm House Hotel, LLP, at the price of \$500,000
21 each plus 40 to \$60,000 in administrative fees.

22 Isn't it true that that representation was
23 made to potential EB-5 investors by the principals of the
24 Palm House Hotel project?

25 MR. SALAZAR: Objection to form.

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1 THE WITNESS: On advice of counsel, I'm
2 exercising my rights under the Fifth Amendment and decline
3 to answer the question.

4 BY MR. GEORGE:

5 Q. And that representation is a lie, as well,
6 isn't it?

7 A. On advice of counsel, I'm exercising my
8 rights under the Fifth Amendment and decline to answer the
9 question.

10 Q. And, in fact, there were somewhere between
11 88 and 90 equity interests sold to EB-5 investors in
12 connection with the Palm House Hotel property, wasn't
13 there?

14 A. On advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.

17 Q. And, in fact, you diverted millions of
18 dollars of the proceeds of those sales for your own
19 personal use, didn't you?

20 A. On advice of counsel, I'm exercising my
21 rights under the Fifth Amendment and decline to answer the
22 question.

23 Q. Direct your -- I direct you to Paragraph
24 C-IV, which says plaintiffs' funds would be exclusively
25 invested in the Palm House Hotel to create jobs by helping

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1 to finish the renovation and development, which was near
2 completion.

3 Isn't it true that that representation was
4 made to potential EB-5 investors in the Palm House Hotel
5 project in order to induce them to invest?

6 A. On advice of counsel, I'm exercising my
7 rights under the Fifth Amendment and decline to answer the
8 question.

9 Q. And isn't it true that that representation
10 was a lie when that was made to the EB-5 investors to
11 induce them to invest?

12 A. On advice of counsel, I'm exercising my
13 rights under the Fifth Amendment and decline to answer the
14 question.

15 Q. And isn't it true that, in fact, the EB-5
16 investors' funds that were invested, were not exclusively
17 invested in the Palm House Hotel to help create jobs by
18 helping to finish the renovation and development, which
19 was near completion?

20 A. On advice of counsel, I'm exercising my
21 rights under the Fifth Amendment and decline to answer the
22 question.

23 Q. That didn't happen, in part, because you
24 took the EB-5 investment money for your own personal use,
25 didn't you?

Page 220

1 A. On advice of counsel, I'm exercising my
2 rights under the Fifth Amendment and decline to answer the
3 question.

4 Q. And, in fact, you and your husband conspired
5 to take that money for your own personal use, didn't you?

6 A. On advice of counsel, I'm exercising my
7 rights under the Fifth Amendment and decline to answer the
8 question.

9 Q. The two of you figured out a way to use the
10 money to buy a yacht; right?

11 A. On advice of counsel, I'm exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 Q. And you also used my clients' EB-5
15 investment monies to pay off personal mortgages on your
16 home at Casa Bendita, didn't you?

17 A. On advice of counsel, I am exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. And you also diverted money so that you
21 could drive fancy cars, didn't you?

22 A. On advice of counsel, I'm exercising my
23 rights under the Fifth Amendment and decline to answer the
24 question.

25 Q. And you used that money to have really

55 (Pages 217 to 220)

Page 221

1 expensive dinners at Mar-a-Lago, didn't you?
 2 MR. SALAZAR: Objection to form.
 3 THE WITNESS: On advice of counsel, I'm
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. GEORGE:
 7 Q. You were a member at Mar-a-Lago, weren't
 8 you?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. I direct you to Paragraph C-V, it says the
 13 Palm House Hotel will be open for business, by the quote,
 14 unquote, "season" of 2013/2014, and was 80 to 90 percent
 15 completed prior to plaintiffs' investments.
 16 Isn't it true that the principals of
 17 Palm House Hotel made those representations to potential
 18 EB-5 investors in order to induce them to invest in the
 19 project?
 20 MR. SALAZAR: Objection to form.
 21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.
 24 BY MR. GEORGE:
 25 Q. In fact, that was a lie at the time it was

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1 told to the EB-5 investors, wasn't it?
 2 MR. SALAZAR: Same objection.
 3 THE WITNESS: On advice of counsel, I am
 4 exercising my rights under the Fifth Amendment and decline
 5 to answer the question.
 6 BY MR. GEORGE:
 7 Q. And, in fact, the Palm House Hotel did not
 8 open for business by the 2000/2014 -- I'm sorry, 2013/2014
 9 season, did it?
 10 A. On advice of counsel, I'm exercising my
 11 rights under the Fifth Amendment and decline to answer the
 12 question.
 13 Q. Are you familiar with what plans for
 14 construction at the Palm House Hotel were approved by the
 15 Town of Palm Beach?
 16 A. On advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 Q. Direct you to Paragraph C-VI, it says the
 20 funds will create 930 jobs, more than the required 790
 21 full-time jobs for the offering.
 22 Isn't it true that representations were made
 23 to the EB-5 investors regarding the number of jobs that
 24 would be created in this project in order to induce them
 25 to invest?

Page 223

1 MR. SALAZAR: Objection to form.
 2 THE WITNESS: On advice of counsel, I'm
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. GEORGE:
 6 Q. And that was a lie when it was told to the
 7 EB-5 investors in order to get them to invest, wasn't it?
 8 A. On advice of counsel, I'm exercising my
 9 rights under the Fifth Amendment and decline to answer the
 10 question.
 11 Q. And, in fact, one of the reasons why the
 12 EB-5 investors I-5 26 petitions were denied, is because
 13 the USCIS found that these job creation estimates were
 14 fraudulent, isn't that true?
 15 A. On advice of counsel, I'm exercising my
 16 rights under the Fifth Amendment and decline to answer the
 17 question.
 18 Q. Let me point out to you Paragraph C-VIII.
 19 Do you see there where it says, plaintiffs' funds would be
 20 the third and final source of funds? The EB-5 funds were
 21 in addition to an equity investment by the developer in
 22 excess of \$22 million in a bank loan by a bank that had
 23 done full due diligence justifying such a loan in excess
 24 of \$29 million. Accordingly, plaintiffs' funds
 25 constituted less than 50 percent of the project funding.

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1 Isn't it true that the principals of the
 2 Palm House Hotel made those representations to EB-5
 3 investors in order to induce them to invest?
 4 MR. SALAZAR: Objection to form.
 5 MR. MARIANI: Excuse me, that's Item C-VII,
 6 not C-VIII, is that the one?
 7 MR. GEORGE: Thank you for -- thank you for
 8 correcting me.
 9 MR. SALAZAR: Objection to form.
 10 THE WITNESS: On advice of counsel, I'm
 11 exercising my rights under the Fifth Amendment and decline
 12 to answer the question.
 13 BY MR. GEORGE:
 14 Q. Isn't it true that that statement, when it
 15 was made to the investors, was a lie?
 16 A. On advice of counsel, I'm exercising my
 17 rights under the Fifth Amendment and decline to answer the
 18 question.
 19 Q. Isn't it true that the developer referred to
 20 in that paragraph is your husband, Robert Matthews?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 Q. Is your husband, Robert Matthews, the
 25 developer of the Palm House Hotel project?

56 (Pages 221 to 224)

Page 225

1 A. On advice of counsel, I'm exercising my
2 rights under the Fifth Amendment and decline to answer the
3 question.

4 Q. Isn't it true, Mrs. Matthews, that your
5 husband, Robert Matthews, has been the developer of the
6 hotel project continuously since 2006?

7 A. On advice of counsel, I'm exercising my
8 rights under the Fifth Amendment and decline to answer the
9 question.

10 Q. Isn't it true, Mrs. Matthews, that even
11 after he supposedly lost the hotel through a foreclosure
12 sale in 2009, that he continued to be the developer of the
13 hotel project?

14 A. On advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.

17 Q. Isn't it true that when Mr. Straub bought
18 the hotel for \$10 million out of foreclosure, that he did
19 so as a favor to your husband, Robert Matthews?

20 MR. SALAZAR: Objection to form.

21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 BY MR. GEORGE:

25 Q. Isn't it true that Mr. Straub bought the

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1 Palm House Hotel out of foreclosure sale for \$10 million?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer the
4 question.

5 Q. Isn't it true that after Mr. Straub bought
6 the hotel in a foreclosure sale, he allowed your husband
7 to continue to control the property?

8 A. On advice ---

9 MR. SALAZAR: Objection to form. Pardon me.

10 THE WITNESS: On advice of counsel, I'm
11 exercising my rights under the Fifth Amendment and decline
12 to answer the question.

13 BY MR. GEORGE:

14 Q. Now, in fact, at the time the EB-5 investors
15 were told that your husband, Robert Matthews, had
16 \$22 million in equity in the Palm House Hotel project,
17 that was not a true statement, was it?

18 A. On advice of counsel, I'm exercising my
19 rights under the Fifth Amendment and decline to answer the
20 question.

21 Q. As of August 30, 2013, your husband,
22 Robert Matthews, didn't have any equity in the Palm House
23 Hotel property, did he?

24 A. On advice of counsel, I'm exercising my
25 rights under the Fifth Amendment and decline to answer the

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1 question.

2 Q. And as we sit here today, your husband,
3 Robert Matthews, doesn't have any equity in the Palm House
4 Hotel project, does he?

5 A. On advice of counsel, I'm exercising my
6 rights under the Fifth Amendment and decline to answer the
7 question.

8 Q. That was a lie that was told by, among
9 others, your husband and Joseph Walsh in order to get
10 investors in the Palm House Hotel property to invest;
11 isn't that true?

12 A. On advice of counsel, I'm exercising my
13 rights under the Fifth Amendment and decline to answer the
14 question.

15 Q. And isn't it true that Mr. Straub knew that
16 the Palm House Hotel project was being financed by EB-5
17 investors?

18 A. On advice of counsel, I'm exercising my
19 rights under the Fifth Amendment and decline to answer the
20 question.

21 MR. SALAZAR: I'll object to the form of
22 that question.

23 BY MR. GEORGE:

24 Q. Were you ever in the presence of your
25 husband and Mr. Straub when they discussed who was

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1 financing the Palm House Hotel property?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer
4 that question.

5 Q. Were you ever in the presence of your
6 husband and Mr. Straub when they discussed that EB-5
7 investors were financing the construction of the
8 Palm House Hotel property?

9 MR. SALAZAR: Objection to form.

10 THE WITNESS: On advice of counsel, I'm
11 exercising my rights under the Fifth Amendment and decline
12 to answer the question.

13 BY MR. GEORGE:

14 Q. Now, in that paragraph it says that there
15 was a \$29 million bank loan on the Palm House Hotel
16 property. That's an untrue statement, isn't it?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. Isn't it true, Mrs. Matthews, that there's
21 never been a \$29 million bank loan on the Palm House Hotel
22 property?

23 A. On advice --

24 MR. SALAZAR: Objection to form.

25 THE WITNESS: -- of counsel, I am exercising

57 (Pages 225 to 228)

Page 229

1 my rights under the Fifth Amendment and decline to answer
2 the question.

3 BY MR. GEORGE:

4 Q. I'm going to refer you to Paragraph C-VIII,
5 which says plaintiffs' funds would be held in escrow and
6 were not yet needed because the developer's investment in
7 excess of \$22 million and a bank loan in excess of
8 \$29 million was being used for construction and
9 renovation.

10 Isn't it true that that representation was
11 made to EB-5 investors in order to induce them to invest
12 in the Palm House Hotel property?

13 A. On advice --

14 MR. SALAZAR: Objection to form.

15 THE WITNESS: -- of counsel, I'm exercising
16 my rights under the Fifth Amendment and decline to answer
17 the question.

18 BY MR. GEORGE:

19 Q. Isn't it true that that was a lie that was
20 told to the EB-5 investors in order to get them to invest?

21 MR. SALAZAR: Objection to form.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 BY MR. GEORGE:

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1 Q. And that was a false statement when it was
2 made to the EB-5 investors, wasn't it?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 Q. And you, in fact, saw marketing materials
7 that were distributed to the EB-5 investors that contained
8 all of the statements we've discussed so far, haven't you?

9 A. On advice of counsel, I'm exercising my
10 rights under the Fifth Amendment and decline to answer the
11 question.

12 Q. So you have personal knowledge of the fact
13 that these misrepresentations were made to EB-5 investors
14 in order to get them to invest, don't you?

15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.

18 Q. In fact, you've discussed the marketing
19 materials with respect to the Palm House Hotel project
20 with your husband, haven't you?

21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 Q. And you did that prior to the time those
25 marketing materials were disseminated to EB-5 investors,

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1 didn't you?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer the
4 question.

5 Q. And don't you have personal knowledge of the
6 fact that your husband reviewed and edited marketing
7 materials with respect to the Palm House Hotel property
8 before they were disseminated to potential investors?

9 A. On advice of counsel, I'm exercising my
10 rights under the Fifth Amendment and decline to answer the
11 question.

12 Q. I direct you to Paragraph C-IX, which says
13 plaintiffs' funds would not be taken from the escrow
14 account and would not be used unless and until the
15 developer's investment in excess of \$22 million, and the
16 bank funds in excess of \$29 million had been used -- had
17 been used at the project.

18 Isn't it true that those representations
19 were made to the EB-5 investors in order to induce them to
20 invest in the Palm House Hotel project?

21 MR. SALAZAR: Same objection.

22 THE WITNESS: On advice of counsel, I'm
23 exercising my rights under the Fifth Amendment and decline
24 to answer the question.

25 BY MR. GEORGE:

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1 Q. Now, when those payments were made to the
2 EB-5 investors, they were false, weren't they?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 Q. Because, in fact, at the time that statement
7 was made, there was no developer investment of \$22 million
8 in the Palm House property, was there?

9 A. On advice of counsel, I'm exercising my
10 rights under the Fifth Amendment and decline to answer the
11 question.

12 MR. SALAZAR: Object to the form of that
13 last question.

14 BY MR. GEORGE:

15 Q. So there was no \$22 million that could be
16 spent ahead of the EB-5 investment monies, was there?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. And at the time those statements were made
21 to the EB-5 investors in order to induce them to invest,
22 there was no \$29 million bank loan, was there?

23 MR. SALAZAR: Objection to form.

24 THE WITNESS: On advice of counsel, I'm
25 exercising my rights under the Fifth Amendment and decline

58 (Pages 229 to 232)

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1 to answer the question.

2 BY MR. GEORGE:

3 Q. So there was no \$29 million to be spent
4 ahead of the EB-5 investors' investment monies, were
5 there?

6 A. On advice of counsel, I'm exercising my
7 rights under the Fifth Amendment and decline to answer the
8 question.

9 Q. So isn't it true that the intention at the
10 time these statements were made, was that the EB-5
11 investors' money would be invested and immediately used by
12 you and your husband and others, rather than being
13 invested in the Palm House Hotel property?

14 MR. SALAZAR: Objection to form.

15 THE WITNESS: On advice of counsel, I'm
16 exercising my rights under the Fifth Amendment and decline
17 to answer the question.

18 BY MR. GEORGE:

19 Q. Well, other than the EB-5 investment monies,
20 what monies existed to renovate the hotel?

21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 Q. Isn't it true that at the time these
25 statements were made, 160 Royal Palm, LLC had no capital

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1 materials for Palm House -- for the Palm House project
2 with Mr. Straub?

3 A. On advice of counsel, I'm exercising my
4 rights under the Fifth Amendment and decline to answer the
5 question.

6 Q. I'm going to refer you to Paragraph C-X,
7 which says the real property at issue was currently worth
8 110 million to 137 million, in parentheses, (the current
9 value representation varied depending on what the bad
10 actors believed a particular plaintiff wanted to hear),
11 closed parentheses, before completion, which made the
12 investment, quote, "one of the safest EB-5 offerings from
13 a job creation and investment position."

14 Isn't it true that those representations
15 were made to potential EB-5 investors in order to induce
16 them to invest in the Palm House Hotel project?

17 MR. SALAZAR: Objection to form.

18 THE WITNESS: On advice of counsel, I'm
19 exercising my rights under the Fifth Amendment and decline
20 to answer the question.

21 BY MR. GEORGE:

22 Q. And those representations were false when
23 they were made, weren't they?

24 A. On the advice of counsel, I am exercising my
25 rights under the Fifth Amendment and decline to answer the

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1 within -- with which to use to continue construction of
2 the project?

3 MR. SALAZAR: Objection to form.

4 THE WITNESS: On advice of counsel, I'm
5 exercising my rights under the Fifth Amendment and decline
6 to answer the question.

7 BY MR. GEORGE:

8 Q. Did 160, LLC -- 160 -- sorry. For purposes
9 of brevity, is it okay if I refer to 160 Royal --
10 160 Royal Palm, LLC as 160 --

11 MR. SALAZAR: Yes, that's fine by me.

12 MR. GEORGE: -- just for purposes of
13 brevity?

14 MR. MARIANI: Yeah, we can do that.

15 MR. GEORGE: Okay. Thank you.

16 BY MR. GEORGE:

17 Q. What other monies did 160 have at the time
18 these representations were made to the EB-5 investors?

19 A. On advice of counsel, I am exercising my
20 rights under the Fifth Amendment and decline to answer the
21 question.

22 MR. SALAZAR: I object to the form of that
23 question.

24 BY MR. GEORGE:

25 Q. Did you ever review any of the marketing

Page 236

1 question.

2 Q. And isn't it true that the Palm House Hotel
3 property was not worth \$110 million at the time those
4 statements were disseminated to EB-5 investors?

5 A. On advice of counsel, I am exercising my
6 rights under the Fifth Amendment and decline to answer the
7 question.

8 Q. And isn't it true that the Palm House Hotel
9 property was not worth between 110 million and 137 million
10 at the time these statements were made?

11 A. On advice of counsel, I am exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 Q. And, in fact, isn't it true that the
15 Palm House Hotel property was nowhere near that amount of
16 money when the EB-5 investors were being told that it was?

17 A. On advice --

18 MR. SALAZAR: Objection to form.

19 THE WITNESS: -- of counsel, I am exercising
20 my rights under the Fifth Amendment and decline to answer.
21 BY MR. GEORGE:

22 Q. Have you seen a current appraisal with
23 respect to the value of the Palm House Hotel property?

24 A. On the advice of counsel, I'm exercising my
25 rights under the Fifth Amendment and decline to answer the

59 (Pages 233 to 236)

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1 question.
 2 Q. Let me refer you to Paragraph C-Roman
 3 Numeral -- I think there's a typo. If you go to the top
 4 of Page 8 of Exhibit 18, there is a Paragraph VII, and it
 5 says -- it's a typo, the paragraphs are misnumbered, but
 6 it says, I-5 26 immigration petitions for the Palm House
 7 Hotel project had already been approved by USCIS for the
 8 initial investors. Do you see that statement?

9 MR. MARIANI: It's before the witness.

10 BY MR. GEORGE:

11 Q. Now, isn't it true that that representation
 12 was made to potential EB-5 investors in order to get them
 13 to invest in the Palm House Hotel project?

14 MR. SALAZAR: Objection to form.

15 THE WITNESS: On advice of counsel, I'm
 16 exercising my rights under the Fifth Amendment and decline
 17 to answer the question.

18 BY MR. GEORGE:

19 Q. Now, that statement was false when it was
 20 made to potential EB-5 investors, wasn't it?

21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.

24 Q. In fact, at the time this information was
 25 being disseminated to EB-5 investors, not a single I-5 26

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1 petition had been approved for the Palm House Hotel, had
 2 it?

3 A. On advice of counsel, I'm exercising my
 4 rights under the Fifth Amendment and decline to answer the
 5 question.

6 Q. And, in fact, not a single I-5 26 petition
 7 was ever approved for any EB-5 investor in connection with
 8 this project, was it?

9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.

12 Q. I'm going to refer you to the next
 13 subparagraph there, which says, an insurance policy was
 14 purchased by the developer that guaranteed the
 15 construction of the Palm House Hotel project would be
 16 completed.

17 Isn't it true that that representation was
 18 made to EB-5 investors in order to induce them to invest
 19 in the Palm House Hotel property?

20 MR. SALAZAR: Objection to form.

21 THE WITNESS: On advice of counsel, I'm
 22 exercising my rights under the Fifth Amendment and decline
 23 to answer the question.

24 BY MR. GEORGE:

25 Q. That statement was a lie when it was made to

Page 239

1 potential EB-5 investors; isn't that true?

2 A. On advice of counsel, I'm exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.

5 Q. There was never such a policy in connection
 6 with the Palm House Hotel project, was there?

7 A. On advice of counsel, I'm exercising my
 8 rights under the Fifth Amendment and decline to answer the
 9 question.

10 Q. The next paragraph, which is misnumbered IX,
 11 says the local government guaranteed that construction of
 12 the Palm House Hotel project would be completed and that
 13 this would be the last five star hotel property they would
 14 allow on Palm Beach.

15 Isn't it true that those representations
 16 were made to EB-5 investors, potential EB-5 investors, in
 17 order to induce them to invest in the Palm House Hotel
 18 project?

19 MR. SALAZAR: Same objection, form.

20 THE WITNESS: On advice of counsel, I'm
 21 exercising my rights under the Fifth Amendment and decline
 22 to answer the question.

23 BY MR. GEORGE:

24 Q. That statement -- those statements were
 25 false when they were made to the EB-5 investors, weren't

Page 240

1 they?

2 A. On advice of counsel, I'm exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.

5 Q. The Town of Palm Beach never guaranteed the
 6 completion of the Palm House Hotel project, did they?

7 A. On advice of counsel, I'm exercising my
 8 rights under the Fifth Amendment and decline to answer the
 9 question.

10 Q. In fact, isn't it true that the Town of Palm
 11 Beach was actually fining the developer for failing to
 12 complete the project?

13 MR. SALAZAR: Objection to form.

14 THE WITNESS: On advice of counsel, I am
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.

17 BY MR. GEORGE:

18 Q. Next paragraph, which is misnumbered
 19 Subparagraph X, says the developer, Robert Matthews, was a
 20 famous real estate developer in the United States.

21 Isn't it true that that statement was
 22 made -- that representation was made to the EB-5 investors
 23 in order to induce them to invest in the Palm House Hotel
 24 property?

25 A. On advice ---

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1 MR. SALAZAR: Objection to form. Sorry.
 2 THE WITNESS: On advice of counsel, I am
 3 exercising my rights under the Fifth Amendment and decline
 4 to answer the question.
 5 BY MR. GEORGE:
 6 Q. And that statement was a lie when it was
 7 made to the EB-5 investors in order to induce them to
 8 invest, wasn't it?
 9 A. On advice of counsel, I'm exercising my
 10 rights under the Fifth Amendment and decline to answer the
 11 question.
 12 Q. In fact, at the time these statements were
 13 made to the EB-5 investors, your husband, Mr. Matthews,
 14 had essentially lost all of his real estate holdings,
 15 hadn't he?
 16 A. On advice of counsel, I am exercising my
 17 rights under the Fifth Amendment and decline to answer
 18 that question.
 19 Q. And, in fact, when these statements were
 20 made, he had already had to have turned to Mr. Straub to
 21 bail him out of several deals going bad, didn't he?
 22 MR. SALAZAR: Objection to form.
 23 THE WITNESS: On advice of counsel, I am
 24 exercising my rights under the Fifth Amendment and decline
 25 to answer the question.

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1 BY MR. GEORGE:
 2 Q. In fact, in connection with your residence
 3 in Nantucket, the 11 Cliff Road property, he asked
 4 Mr. Straub to step in and help him shield himself from a
 5 \$2 million judgment so his creditors couldn't get at that
 6 money, didn't he?
 7 MR. SALAZAR: Objection to form.
 8 THE WITNESS: On the advice of counsel, I am
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. GEORGE:
 12 Q. Your husband did have a \$2 million judgment
 13 entered against him in Nantucket, didn't he?
 14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 Q. And, in fact, that \$2 million judgment was
 18 with respect to the Point Breeze Hotel, another project
 19 that had gone bad, wasn't it?
 20 A. On advice of counsel, I'm exercising my
 21 rights under the Fifth Amendment and decline to answer the
 22 question.
 23 Q. And Mr. Straub helped your husband make sure
 24 he never had to pay that judgment off, didn't he?
 25 MR. SALAZAR: Objection to form.

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1 THE WITNESS: On advice of counsel, I'm
 2 exercising my rights under the Fifth Amendment and decline
 3 to answer the question.
 4 BY MR. GEORGE:
 5 Q. How many times have you and your husband had
 6 Mr. Straub bail you out of dire financial circumstances?
 7 MR. SALAZAR: Objection to form.
 8 THE WITNESS: On advice of counsel, I'm
 9 exercising my rights under the Fifth Amendment and decline
 10 to answer the question.
 11 BY MR. GEORGE:
 12 Q. Next subparagraph, which is mislabelled XI,
 13 says each investor's investment will be fully secured by
 14 the real property at issue and by the State of Florida
 15 pursuant to UCC Form. As there would be 79 rooms and 79
 16 investors, each investor would be given a UCC security
 17 interest in an individual room.
 18 Isn't it true that those statements were
 19 made to potential EB-5 investors in order to get them to
 20 invest in the -- in the Palm House Hotel project?
 21 A. On advice of counsel, I'm exercising my
 22 rights under the Fifth Amendment and decline to answer the
 23 question.
 24 Q. And those statements were lies when they
 25 were made to the EB-5 investors, weren't they?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. In fact, there were never UCC security
 5 interests given to any of the EB-5 investors in any of the
 6 rooms in the Palm House Hotel project, were there?
 7 A. On advice of counsel, I'm exercising my
 8 rights under the Fifth Amendment and decline to answer the
 9 question.
 10 Q. And, in fact, none of the EB-5 investors'
 11 investments in the Palm House Hotel project were fully
 12 secured by the real property itself, were they?
 13 MR. SALAZAR: Objection to form.
 14 THE WITNESS: On advice of counsel, I'm
 15 exercising my rights under the Fifth Amendment and decline
 16 to answer the question.
 17 BY MR. GEORGE:
 18 Q. Now, you knew that there was a mortgage on
 19 the Palm House Hotel property as of the time that
 20 Mr. Straub sold the property back to your husband, didn't
 21 you?
 22 A. On advice of counsel, I'm exercising my
 23 rights under the Fifth Amendment and decline to answer the
 24 question.
 25 Q. Was there a Palm -- was there an advisory

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1 board for the Palm House Hotel at any point in time?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer the
4 question.

5 Q. Isn't it true that the EB-5 -- potential
6 EB-5 investors were told that Donald Trump would serve on
7 the advisory board for the Palm House Hotel?

8 MR. SALAZAR: Objection to form, you can
9 answer.

10 THE WITNESS: On advice of counsel, I'm
11 exercising my rights under the Fifth Amendment and decline
12 to answer the question.

13 BY MR. GEORGE:

14 Q. And that representation was absolutely false
15 when it was made to potential EB-5 investors, wasn't it?

16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.

19 Q. And, in fact, you and your husband took
20 Chinese immigration agents to Mar-a-Lago in order to make
21 it appear that Mr. Trump actually would be on the hotel
22 advisory board, didn't you?

23 MR. SALAZAR: Objection to form.

24 THE WITNESS: On advice of counsel, I'm
25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.

2 BY MR. GEORGE:

3 Q. And you even went so far as to stage
4 pictures with Mr. Trump in order to trick the immigration
5 agents into believing he was part of this project, didn't
6 you?

7 MR. SALAZAR: Objection to form.

8 THE WITNESS: On advice of counsel, I'm
9 exercising my rights under the Fifth Amendment and decline
10 to answer the question.

11 BY MR. GEORGE:

12 Q. And, in fact, there were marketing materials
13 distributed to potential EB-5 investors that had Mister --
14 President Trump's likeness in them, wasn't there?

15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.

18 Q. And isn't it true that the Trump
19 organization sent a cease and desist letter ordering the
20 Palm House Hotel and the various individuals associated
21 with it to stop using his likeness and name in connection
22 with this project?

23 A. On advice of counsel, I'm exercising my
24 rights under the Fifth Amendment and decline to answer the
25 question.

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1 Q. Isn't it true that Bill Clinton was never --
2 never agreed to serve on the Palm House Hotel advisory
3 board?

4 A. On advice of counsel, I'm exercising my
5 rights under the Fifth Amendment and decline to answer the
6 question.

7 Q. Isn't it true that without permission,
8 President Clinton's likeness was used in Palm House Hotel
9 marketing materials, and those materials were distributed
10 to potential EB-5 investors in order to trick them into
11 believing that he was associated with this project?

12 A. On advice of counsel, I'm exercising my
13 rights under the Fifth Amendment and decline to answer the
14 question.

15 Q. Was there a hotel club that was associated
16 with the Palm House Hotel?

17 A. On advice of counsel, I'm exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. You need a break?

21 A. I'm good.

22 MR. SALAZAR: Do you have much more?

23 MR. GEORGE: Probably 15, 20 minutes.

24 THE WITNESS: No, I'm fine. I just got a
25 little dry, my apologies.

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1 MR. SALAZAR: I'm so sorry, I could use a
2 break.

3 MR. GEORGE: Do you want to take a few
4 minutes?

5 MR. SALAZAR: I just need to run to the
6 bathroom.

7 MR. LANDAU: I do, as well.

8 (Thereupon, a brief recess was taken, after
9 which the following proceedings were had:)

10 BY MR. GEORGE:

11 Q. Isn't it true that there were
12 representations made to potential EB-5 investors that
13 there would be an exclusive invitation only club at the
14 Palm House Hotel?

15 A. On advice of counsel, I'm exercising my
16 rights under the Fifth Amendment and decline to answer the
17 question.

18 Q. And isn't it true there were no memberships
19 to that club ever sold because the hotel was never
20 actually open for business?

21 A. On advice of counsel, I'm exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 Q. So isn't it true that in this paragraph
25 where it says Tony Bennett was already a member of the

Page 249

1 hotel club, that was a lie, wasn't it?

2 A. On advice of counsel, I'm exercising my

3 rights under the Fifth Amendment and decline to answer the

4 question.

5 Q. Tony Bennett was never a member of any

6 exclusive club associated with the Palm House Hotel, was

7 he?

8 A. On advice of counsel, I'm exercising my

9 rights under the Fifth Amendment and decline to answer the

10 question.

11 Q. Do either you or your husband even know

12 Tony Bennett?

13 A. On advice of counsel, I'm exercising my

14 rights under the Sixth -- Fifth Amendment and decline to

15 answer the question.

16 Q. Isn't it true that Celine Dion was never a

17 member of any sort of exclusive club at the Palm House

18 Hotel?

19 A. On advice of counsel, I'm exercising my

20 rights under the Fifth Amendment and decline to answer the

21 question.

22 Q. Do you or your husband even know

23 Celine Dion?

24 A. On advice of counsel, I'm exercising my

25 rights under the Fifth Amendment and decline to answer the

Page 250

1 question.

2 Q. Did you ever talk to Mr. Straub about

3 helping you recruit members for the exclusive club that

4 potential EB-5 investors were told would exist at the

5 Palm House Hotel?

6 A. On advice of counsel, I'm exercising my

7 rights under the Fifth Amendment and decline to answer the

8 question.

9 Q. Was it ever disclosed to any of the

10 potential EB-5 investors that there was a first mortgage

11 on the property in favor of KK-PB Financial, LLC?

12 A. On advice of counsel, I am exercising my

13 rights under the Fifth Amendment and decline to answer the

14 question.

15 Q. Isn't it a fact that the existence of

16 KK-PB Financial, LLC's mortgage was concealed from

17 potential EB-5 investors through the time it was actually

18 recorded in the public records of Palm Beach County?

19 MR. SALAZAR: Sorry, could you repeat that

20 question? Sorry.

21 (Thereupon, the pending question was read

22 back by the court reporter.)

23 THE WITNESS: On advice of counsel, I'm

24 exercising my rights under the Fifth Amendment and decline

25 to answer the question.

Page 251

1 BY MR. GEORGE:

2 Q. Isn't it true that there was a seven-month

3 gap between the closing of the sale of the Palm House

4 Hotel to your husband and the recording of the KK-PB

5 mortgage in the public records of Palm Beach County,

6 Florida?

7 MR. SALAZAR: Objection to form.

8 THE WITNESS: On advice of counsel, I'm

9 exercising my rights under the Fifth Amendment and decline

10 to answer the question.

11 BY MR. GEORGE:

12 Q. Isn't it true that there were

13 representations made to potential EB-5 investors that

14 they, in fact, would have a first lien on the Palm House

15 Hotel property?

16 A. On advice of counsel, I'm exercising my

17 rights under the Fifth Amendment and decline to answer the

18 question.

19 Q. And isn't it true that those representations

20 were false at the time they were made to potential EB-5

21 investors?

22 A. On advice of counsel, I'm exercising my

23 rights under the Fifth Amendment and decline to answer the

24 question.

25 Q. Was it ever disclosed to potential EB-5

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1 investors that their monies, in fact, would not be held in

2 an escrow account until their I-5 26 petitions were

3 approved?

4 A. On advice of counsel, I am exercising my

5 rights under the Fifth Amendment and decline to answer the

6 question.

7 Q. Isn't it true that the first three mortgage

8 payments made by Palm House, LLC to KK-PB Financial were

9 made using EB-5 investors' money?

10 MR. SALAZAR: Objection to form.

11 THE WITNESS: On advice of counsel, I'm

12 exercising my rights under the Fifth Amendment and decline

13 to answer the question.

14 BY MR. GEORGE:

15 Q. Isn't it true that Palm House, LLC had no

16 other source of funds to make mortgage payments, other

17 than from EB-5 investors' money?

18 A. On advice of counsel, I'm exercising my

19 rights under the Fifth Amendment and decline to answer the

20 question.

21 Q. Isn't it true that Mr. Straub knew that Palm

22 House, LLC had no other source of funds to pay the KK-PB

23 mortgage, other than EB-5 investors' money?

24 A. On advice of counsel, I'm exercising my

25 rights under the Fifth Amendment and decline to answer the

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1 question.

2 MR. GEORGE: I'm sorry, let's go off the
3 record a minute.

4 (Discussion off the record.)

5 MR. GEORGE: Back on the record, please.

6 BY MR. GEORGE:

7 Q. Mrs. Matthews, your counsel has put back in
8 front of you Exhibit Number 14, which are the text
9 messages that Mr. Landau discussed with you earlier.

10 Would you please turn to Page MM13? Before
11 I ask about any specific texts there, isn't it true that
12 you have discussed with Mr. Straub the fact that the EB-5
13 investors who invested in the Palm House Hotel property
14 were -- were citizens of countries other than the
15 United States?

16 A. On advice of counsel, I'm exercising my
17 rights under the Fifth Amendment and decline to answer the
18 question.

19 Q. He knew that the investors were from China,
20 for example, didn't he?

21 A. On advice of counsel, I am exercising my
22 rights under the Fifth Amendment and decline to answer the
23 question.

24 Q. And he knew there were investors from Iran?

25 A. On advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
2 question.

3 Q. And he knew there were investors from
4 Turkey?

5 A. On advice of counsel, I am exercising my
6 rights under the Fifth Amendment and decline to answer the
7 question.

8 Q. Okay. At the top of Page MM13, do you see
9 there's a picture there that you had sent to Mr. Straub on
10 May 19, 2018 at 11:11 a.m.? Do you see that picture?

11 MR. MARIANI: That's before the witness.

12 BY MR. GEORGE:

13 Q. There's a text back from Mr. Straub at
14 5/19/18 at 11:25 a.m., and it says in part, I felt like my
15 philosophy on minorities stinks.

16 Did you discuss with him what he meant by
17 that statement?

18 MR. SALAZAR: Objection to form.

19 THE WITNESS: On advice of counsel, I'm

20 exercising my rights under the Fifth Amendment and decline
21 to answer the question.

22 BY MR. GEORGE:

23 Q. Did you ever discuss Mr. Straub's views on
24 minorities with him?

25 A. On advice of counsel, I'm exercising my

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1 rights under the Fifth Amendment and decline to answer the
2 question.

3 Q. Isn't it true that Mr. Straub does not have
4 a positive view of minorities?

5 MR. SALAZAR: Objection to form.

6 THE WITNESS: On advice of counsel, I'm
7 exercising my rights under the Fifth Amendment and decline
8 to answer the question.

9 BY MR. GEORGE:

10 Q. When we were talking earlier about
11 Mr. Straub's lawsuit against you, did you feel that what
12 Mr. Straub was really trying to do was to teach you a
13 lesson because he felt you had crossed him?

14 A. On advice of counsel, I'm exercising my
15 rights under the Fifth Amendment and decline to answer the
16 question.

17 Q. Mr. Straub feels that it's his duty to teach
18 people lessons who don't do what he wants them to do,
19 doesn't he?

20 MR. SALAZAR: Objection to form.

21 THE WITNESS: On advice of counsel, I am
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 BY MR. GEORGE:

25 Q. Did Mr. Straub tell you that he wanted to

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1 teach the Chinese EB-5 investors a lesson?

2 A. On advice of counsel, I'm exercising my
3 rights under the Fifth Amendment and decline to answer the
4 question.

5 Q. Did he ever tell you he wanted to teach the
6 Iranian investors a lesson?

7 A. On advice of counsel, I am exercising my
8 rights under the Fifth Amendment and decline to answer the
9 question.

10 Q. What about the Turkish investors?

11 A. On advice of counsel, I am exercising my
12 rights under the Fifth Amendment and decline to answer the
13 question.

14 Q. Mr. Straub ever tell you that the EB-5
15 investors should have been smarter and it was their own
16 fault that they were taken advantage of?

17 A. On advice of counsel, I am exercising my
18 rights under the Fifth Amendment and decline to answer the
19 question.

20 Q. When Mr. Straub bought the Palm House Hotel
21 out of foreclosure, he did it as a favor to your husband;
22 right?

23 MR. SALAZAR: Objection to form, asked and
24 answered.

25 BY MR. GEORGE:

64 (Pages 253 to 256)

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1 Q. You can answer.
 2 A. On advice of counsel, I am exercising my
 3 rights under the Fifth Amendment and decline to answer the
 4 question.
 5 Q. Isn't it true that that whole transaction
 6 was a sham to allow your husband to stay in control of the
 7 hotel and not lose it to creditors?
 8 A. On advice of counsel, I'm exercising my
 9 rights under the Fifth Amendment and decline to answer the
 10 question.
 11 Q. Isn't it true that your husband and
 12 Mr. Straub have a long history of protecting your
 13 husband's asset from creditors together?
 14 A. On advice of counsel, I'm exercising my
 15 rights under the Fifth Amendment and decline to answer the
 16 question.
 17 Q. Isn't it true because of your intimate
 18 personal relationship with Mr. Straub over the years, that
 19 he was more than happy to help you and your husband keep
 20 your assets out of the reach of creditors?
 21 A. On advice of counsel, I am exercising my
 22 rights under the Fifth -- Sixth -- Fifth, excuse me,
 23 amendment and decline to answer the question.
 24 Q. That's what he did with respect to
 25 11 Cliff Road; right?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. And that's what he did with your other
 5 property in Nantucket; right?
 6 A. On advice of counsel, I'm exercising my
 7 rights under the Fifth Amendment and decline to answer the
 8 question.
 9 Q. And that's what he did in this case with
 10 respect to 160, as well; right?
 11 MR. SALAZAR: Objection to form.
 12 THE WITNESS: On advice of counsel, I am
 13 exercising my rights under the Fifth Amendment and decline
 14 to answer the question.
 15 MR. GEORGE: I have no further questions.
 16 MR. LANDAU: I have one follow-up -- oh,
 17 Lou, do you have any?
 18 MR. SALAZAR: You can go ahead.
 19 MR. LANDAU: Less than five minutes.
 20 MR. STRAUB: I've heard that before.
 21 REDIRECT-EXAMINATION
 22 BY MR. LANDAU:
 23 Q. Ms. Matthews, I have a few questions
 24 regarding your responses to Mr. George's questions, and
 25 specifically I would direct your attention back to

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1 Exhibit 18 and Paragraph -- the same paragraph that
 2 Mr. George was asking you about, specifically, the
 3 allegations at Paragraph 14C.
 4 Do you have it in front of you?
 5 MR. MARIANI: It's in front of the witness.
 6 BY MR. LANDAU:
 7 Q. Ms. Matthews, all the questions Mr. George
 8 just went over regarding the representations made to the
 9 EB-5 creditors, none of those representations are
 10 discussed in Mr. Matthews, your husband, Robert Matthews,
 11 plan of reorganization, are they?
 12 A. On advice of counsel, I'm exercising my
 13 rights under the Fifth Amendment and decline to answer the
 14 question.
 15 Q. And don't you feel that those
 16 representations or misrepresentations would be material
 17 statements that should be included in the plan of
 18 reorganization?
 19 A. On advice of counsel, I'm exercising my
 20 rights under the Fifth Amendment and decline to answer the
 21 question.
 22 Q. Because of the fact that your husband,
 23 Robert Matthews, got you into this mess with regard to the
 24 Palm House Hotel, you would have claims against your
 25 husband, wouldn't you?

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1 A. On advice of counsel, I'm exercising my
 2 rights under the Fifth Amendment and decline to answer the
 3 question.
 4 Q. In fact, you would be a creditor of your
 5 husband, Robert Matthew, wouldn't you?
 6 A. On advice of counsel, I'm exercising my
 7 rights under the Fifth Amendment and decline to answer the
 8 question.
 9 MR. LANDAU: No further questions.
 10 MR. MARIANI: Okay. Thank you. We'll read.
 11 MR. SALAZAR: May I have a quick question,
 12 just very short, very brief? Promise it will be brief,
 13 promise.
 14 MR. MARIANI: Well, why didn't you go after
 15 David?
 16 MR. SALAZAR: Because he wanted to jump it.
 17 MR. LANDAU: Oh, I thought ---
 18 MR. MARIANI: You guys are all on the same
 19 side.
 20 MR. GEORGE: No, we're not.
 21 MR. LANDAU: No, we're not.
 22 MR. STRAUB: We're definitely not.
 23 CROSS-EXAMINATION
 24 BY MR. SALAZAR:
 25 Q. Ms. Matthews, thank you for bearing with us

65 (Pages 257 to 260)

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1 today. The one thing you've said over and over is that on
2 advice of counsel, you're pleading the Fifth Amendment;
3 correct?

4 MR. MARIANI: Objection, form.

5 BY MR. SALAZAR:

6 Q. You can answer.

7 A. On advice of counsel, I'm exercising my
8 rights under the Fifth Amendment and decline to answer
9 that question.

10 Q. And, in fact, no matter how false the
11 premise of the questions asked of you today by co-counsel
12 here, you had to respond as directed by counsel. You
13 responded as directed and advised by counsel; correct?

14 MR. GEORGE: Objection to form.

15 THE WITNESS: On advice of counsel, I'm
16 exercising my rights under the Fifth Amendment and decline
17 to answer the question.

18 BY MR. SALAZAR:

19 Q. So really to any question that would have
20 been asked of you today related to this matter, you would
21 have followed your counsel's advice and answered as you've
22 been answering; correct?

23 MR. GEORGE: Objection to form.

24 THE WITNESS: On advice of counsel, I'm
25 exercising my rights under the Fifth Amendment and decline

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1 to answer the question.

2 BY MR. SALAZAR:

3 Q. So, for example, if I told you isn't it a
4 fact that you and David George conspired to cause the EB-5
5 investors to invest in this hotel property, you would
6 answer exactly the same way you've answered all day;
7 correct?

8 MR. GEORGE: Objection to form. I'm
9 embarrassed that I have to sit here and have you ask those
10 kinds of questions.

11 MR. SALAZAR: Thank you, David.

12 THE WITNESS: On advice of counsel, I'm
13 exercising my rights under the Fifth Amendment and decline
14 to answer the question.

15 BY MR. SALAZAR:

16 Q. And if I were to ask you, isn't it true that
17 you conspired with Mr. Landau here to defraud the EB-5
18 investors into investing into that hotel, you would answer
19 the same way; correct?

20 MR. GEORGE: Objection, form.

21 THE WITNESS: On advice of counsel, I'm
22 exercising my rights under the Fifth Amendment and decline
23 to answer the question.

24 MR. SALAZAR: Counsel, you accepted the
25 trial subpoenas today; correct?

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1 MR. MARIANI: We don't have to do that on
2 the record.

3 MR. GEORGE: Objection, he's not being
4 deposed.

5 MR. SALAZAR: I'd like to -- we can go off
6 the record for a moment if you'd like.

7 (Discussion off the record.)

8 MR. SALAZAR: Let's go back on the record,
9 then.

10 BY MR. SALAZAR:

11 Q. Is there any reason you would not be
12 available to appear at trial on December 6th in this
13 matter?

14 A. (The witness confers with counsel.) I'll
15 review that with my attorney.

16 Q. Do you have any plans to be out of the
17 country on December 6th?

18 MR. STRAUB: Are we back on the record?

19 MR. SALAZAR: We should be.

20 MR. MARIANI: It's on the record, yes.
21 No?

22 THE WITNESS: No.

23 MR. SALAZAR: No, she has no plans?

24 MR. MARIANI: No, we don't. No, we don't.

25 MR. SALAZAR: Okay. I have no additional

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1 questions. Thank you.

2 MR. MARIANI: We'll read. Thank you.

3 (Thereupon, the Deposition was concluded at
4 4:45 p.m., and the reading and signing of the deposition
5 were not duly waived.)

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MARIA MATTHEWS

Sworn to before me this _____ day of
_____, 2018.

NOTARY PUBLIC

My Commission Expires: